



October 16, 2024

**VIA CM/ECF**

Honorable Michael B. Kaplan, U.S.B.J., Chief  
U.S. Bankruptcy Court, District of New Jersey  
402 East State Street  
Trenton, NJ 08608

**Re: In re Whittaker, Clark, & Daniels, Inc., et al., Case No. 23-13575 (MBK)  
(Bankr. D.N.J.)**

Dear Chief Judge Kaplan:

On behalf of the Official Committee of Talc Claimants (the “**Committee**”) and the Honorable Shelley C. Chapman (Ret.), as the court-appointed Future Claimants’ Representative (the “**FCR**”), in the above-referenced bankruptcy proceeding of Whittaker, Clark & Daniels, Inc. and its debtor affiliates (the “**Debtors**”), we write in regard to a discovery dispute between the Committee & FCR and the Debtors with respect to the Debtors’ assertions of privilege over information they have placed at issue in their *Motion for Entry of an Order (I) Approving the Settlement Agreement Between the Debtors and the Contributing Parties, (II) Authorizing the Debtors to Perform All of Their Obligations Thereunder, and (III) Granting Related Relief* [Dkt. 1297] (the “**Motion**”)<sup>1</sup>.

The Committee & FCR seek an order compelling the Debtors to produce unredacted copies of the documents listed on Exhibit A, and any other documents or information relied on by the Debtors’ directors in connection with their review, analysis, and approval of the Settlement Agreement and withheld by the Debtors on the basis of privilege. The Committee & FCR further seek an order stating that the Debtors cannot rely on the attorney-client privilege or attorney work product doctrine to shield evidence, including at depositions, about the information on which their purportedly independent directors relied in approving the Settlement.

As set forth in more detail below, the reasons for this request are simple and warranted under applicable law. The Debtors’ directors, Timothy Pohl and Paul Aronzon, joined the Debtors’ boards less than a month before the Debtors filed their voluntary bankruptcy petitions. The Debtors have admitted that these purportedly independent directors know nothing about the claims they settled aside from what they have learned through counsel. Despite that, the Debtors argue that the directors’ decision to settle the claims is entitled to the business judgment rule. And the Debtors’ submissions explain that the directors’ “business judgment” was based entirely on information from counsel. Yet the Debtors withhold that very information as privileged, leaving the Committee & FCR—and, more importantly, this Court—to simply take them at their word. That cannot be so.

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<sup>1</sup> As used herein, other defined terms shall have the meaning ascribed to them in the Motion.

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### PRELIMINARY STATEMENT

In seeking approval of a settlement between the Debtors and their corporate parents, the Debtors have claimed that the business judgment rule applies. According to that standard, the Court must consider, in part, whether the Debtors' directors were "uninformed, grossly negligent, or lacking independence." *Id.* ¶ 84. In support of the Motion, the Debtors offered affirmative evidence that their directors approved the Settlement Agreement based on "discussions" with "the Debtors' advisors . . . including with respect to the valuation and merits" of the Debtors' causes of action. *E.g.*, Dkt. 1298 ¶ 10. Yet the Debtors have claimed privilege over that information, which was the only factual basis available to the directors when they approved the Settlement Agreement.

Privilege can be a shield or waived and used as a sword, but not both. *In re Human Tissue Prod. Liability Litig.*, 255 F.R.D. 151, 158 (D.N.J. 2008). In one breath, the Debtors ask the Court to approve the Settlement Agreement based on information presented to the directors from counsel's investigation and the Debtors' subsequent exercise of informed "business judgment." *Id.* ¶¶ 84–86. In the next, the Debtors categorically block the Committee & FCR from testing whether their directors really were "well-informed" by asserting privilege over all substantive information underlying this investigation. *Id.* ¶ 90. That is a clear misuse of privilege as both a sword and a shield, and the Debtors cannot block the Committee & FCR's inquiry into the factual basis for their exercise of "business judgment" with respect to the Settlement Agreement.

Accordingly, the Committee & FCR request that the Court find that the Debtors have put the investigation of the claims subject to the Settlement Agreement at issue through the Motion and thereby waived attorney-client privilege or work product protection over such topics, including as to documents identified in Exhibit A and any others.<sup>2</sup> In the alternative, the Court should find that the Debtors have used privilege as a shield over this information and preclude them from using it offensively to support the Motion, including by barring the Debtors' directors from using any information obtained from counsel to justify their decision to enter into the Settlement Agreement.

### FACTUAL AND PROCEDURAL BACKGROUND

In 2022 through early 2023, the Debtors faced mounting talc-asbestos judgments. Dkt. 1293 ¶ 27.<sup>3</sup> The Debtors' directors Raj Mehta, Carmel O'Sullivan, and John Arendt—all officers of NICO—in consultation with others at Berkshire, retained bankruptcy counsel in early 2023. *Id.* ¶ 28. Bankruptcy counsel for the Debtors in turn identified Tim Pohl and Paul Aronzon (the "Directors"), who frequently work with bankruptcy counsel to join boards of distressed companies, to replace Ms. Sullivan and Mr. Arendt. Dkt. 1293 ¶ 29. Mr. Mehta, who has been president of the Debtors since 2007 and an officer of NICO since at least 2008, remained as a director for the Debtors (and officer for NICO). He continues to serve in both roles today.

After installing the Directors, the Debtors petitioned for chapter 11 protection on April 26, 2023. Dkt. 1. Four months later, they filed an adversary proceeding and summary judgment motion asserting that Successor Liability Claims against third party Brenntag are property of the Debtors' estates. Adv. Proc. Dkt. 1, 3. On August 28, 2024, the Court entered a summary judgment order finding "that Successor Liability Claims constitute property of the Debtors' estates." Adv. Proc.

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<sup>2</sup> On the evening of October 15, 2024, after the parties discussed this forthcoming dispute with the Court, the Debtors provided nearly 600 additional privilege log entries. The Committee & FCR have not yet been able to review these entries in detail but believe that many would be covered by the order sought with this letter.

<sup>3</sup> Unless otherwise noted, all internal quotation marks and citing references are omitted, and all emphasis is added.

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Dkt. 292 ¶ 4. The Committee & FCR promptly filed a motion seeking standing to prosecute the Successor Liability Claims as disinterested fiduciaries. Dkt. 1293 (the “**Standing Motion**”).

One of the primary issues in this bankruptcy proceeding is the extent to which the Debtors’ corporate parents, Berkshire and NICO, engineered this proceeding to release at fractional value billions of dollars in talc claims against Brenntag, which NICO ultimately must indemnify. Indeed, there is substantial evidence that Berkshire orchestrated the Debtors’ retention of bankruptcy counsel in 2023 and left Mr. Mehta on the Debtors’ board precisely to achieve this outcome.

On September 3, 2024, the Debtors filed the Settlement Motion, which asks the Court to approve an insider settlement between the Debtors and their corporate parents and effectuate NICO’s interest in releasing billions of dollars in claims it indemnifies at fractional value. Dkt. 1297. The Debtors could have presented this insider settlement to the Court pursuant to the entire fairness doctrine. Instead, the Debtors expressly put at issue whether the Debtors may rely on an exercise of supposed “business judgment” by the Directors. *Id.* ¶¶ 84–86 (arguing that settlement agreement must “be approved as a valid exercise of the Debtors’ business judgment”). The Debtors acknowledge that until just a few months ago, the Directors conducted their responsibilities in tandem with NICO officer Mr. Mehta. And according to discovery in this case, Mr. Mehta—who ran the Debtors for 16 years prior to the Debtors’ bankruptcy filing—was most actively involved in the Debtors’ post-petition management. Nevertheless, the Settlement Motion argues that the Directors “investigated [the Debtors’] potential causes of action against third parties,” assessed the value of those claims, and then negotiated a settlement with the Debtors’ corporate affiliates. *Id.* ¶¶ 33, 62, 85, 86. Although the Committee & FCR disagree, the Debtors argue that “an entire fairness analysis should not apply,” that the Directors’ business judgment controls, and that their judgment “can only be set aside upon a showing that directors did not actually make a decision or were uninformed, grossly negligent, or lacking independence.” *Id.* ¶ 84.

The Debtors chose to investigate the claims released by the Settlement Agreement exclusively through counsel. According to Mr. Pohl’s declaration, he and Mr. Aronzon directed “that the **Debtors’ counsel** investigate the merits and value of . . . potential estate causes of action” and had extensive discussions “with the Debtors’ advisors (including Brattle and **external counsel** . . . with respect to the valuation and merits of any such causes of action.” Dkt. 1298 ¶¶ 8, 10. The Settlement Agreement releases many claims for which the Directors had no independent basis to assess potential liability, and for which the Motion asserts none other than, apparently, information from counsel, including the probability of successfully establishing that Brenntag is a legal successor to the Debtors under relevant tort doctrines, and the merits and value of potential claims for breach of fiduciary duty, alter ego, fraudulent conveyance, and others. Indeed, as one example, the Debtors’ counsel apparently gave a “Presentation to Board re Merits of Successor Liability Claims”—a presentation that would have been critical to the Debtors’ purported exercise of business judgment, but which the Debtors have withheld in its entirety as privileged. *See Ex. A, at 4 (Bates No. BNS-TCC-3323284); Ex. B.* On the basis of information received from the Debtors’ counsel, Mr. Pohl declares that “the Settlement Agreement reflects a fair and reasonable compromise . . . that monetizes and maximizes the value” of the Debtors’ claims and “is a sound exercise of the Debtors’ business judgment.” Dkt. 1298 ¶¶ 13, 14.

The documents produced by the Debtors are redacted entirely as to substantive information, if any, presented to the Directors regarding the Successor Liability Claims and other claims they seek to release. Although the Committee & FCR requested that the Debtors withdraw their

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privilege assertions as to their investigation of the claims resolved by the Settlement Agreement and met and conferred with the Debtors on October 9, 2024, the Debtors declined to do so.

### **LEGAL STANDARD**

The party asserting privilege to prevent discovery bears the burden to prove that the privilege applies. *In re Human Tissue Prod. Liability Litig.*, 255 F.R.D. 151, 156 (D.N.J. 2008). “Because the attorney-client privilege obstructs the truth-finding process, it is construed narrowly.” *Westinghouse Elec. Corp. v. Republic of Phil.*, 951 F.2d 1414, 1423 (3d Cir. 1991).

Privilege “may not be used both as a sword and a shield.” *In re Human Tissue Prod.*, 255 F.R.D. at 158. “In other words, a litigant cannot at one and the same time make use of those privileged communications which support his position while hoping to maintain the privilege as [to] those communications which undercut his legal position.” *Id.* Waiver, however, does not require that a party explicitly cite privileged documents so long as their subject matter “is implicit” to its position. *Id.* at 160. Thus, attorney-client privilege and attorney work product protection, even if properly asserted, can be waived when the asserting party (1) commits an affirmative act (2) which puts the substance of withheld information at issue such that (3) the non-asserting party lacks information vital to its case. *Id.* at 159; *see also In re Trib. Co.*, 2011 WL 386827, at \*7–8 (Bankr. D. Del. 2011) (Carey, J.) (permitting discovery into communications otherwise protected by mediation privilege to “strike[] an appropriate balance between allowing discovery of potentially relevant information and protecting the confidentiality of the mediation”). Ultimately, whether to find a waiver is based on “overriding fairness considerations,” such as “where a party asserts a claim that in fairness requires examination of protected communications.” *In re Human Tissue Prod.*, 255 F.R.D. at 159.

Whether or not waived, work product protection can also be set aside under Rule 26 upon a showing of “substantial need” and “undue hardship.” *See Fed. R. Civ. P. 26(b)(3)(A)(ii); In re Quigley Co., Inc.*, 2009 WL 9034027, at \*8 (Bankr. S.D.N.Y. Apr. 24, 2009) (in asbestos bankruptcy, compelling production of work product material where committee sought to assess the “bad faith of [debtor and affiliates] in pursuing the Plan,” including through “the lack of a legitimate ongoing business” and “value of the [affiliate’s] contribution”).

Where—as here—a transaction is among a debtor and an insider of the debtor, the entire fairness standard applies. *See In re L.A. Dodgers LLC*, 457 B.R. 308, 313 (Bankr. D. Del. 2011) (finding debtors not independent and therefore “not entitled to review using the business judgment standard,” and instead applying entire fairness standard). Where a party asserts that the business judgment rule applies, the adverse party may contest this assertion solely by showing that: “(1) the directors did not in fact make a decision; (2) the directors’ decision was uninformed; (3) the directors were not disinterested or independent; or (4) the directors were grossly negligent.” *Id.*

### **ARGUMENT**

The Debtors wish to release claims against their corporate affiliates through an insider Settlement Agreement yet ask the Court to approve that choice under the business judgment rule. As the Debtors acknowledge, settling claims means first investigating them. The Debtors offered affirmative evidence showing that they did so exclusively through counsel. The Debtors could have investigated the claims themselves, used non-attorneys to conduct the investigation, or declined to place their investigation at issue and instead filed this motion under the entire fairness standard. Although the Committee & FCR submit that the entire fairness standard should apply,

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the Debtors have explicitly placed at issue whether the Directors were “uninformed,” “not disinterested or independent,” or “grossly negligent” in entering the Settlement Agreement. Dkt. 1297 ¶ 84. In doing so, the Debtors have waived privilege over their investigation of the claims released by the Settlement Agreement.

**First**, as the Debtors acknowledge, the Committee & FCR are entitled to show that the business judgment rule is not applicable by establishing that “the directors’ decision was uninformed,” that the directors were “not disinterested or independent,” or that the directors were “grossly negligent.” *Id.* ¶ 84. Indeed, bankruptcy courts—along with federal and state courts across the board—routinely consider the **basis** for a party’s “business judgment” when determining whether that exercise of business judgment was informed and not grossly negligent. *See, e.g., In re Engman*, 331 B.R. 277, 300 (W.D. Mich. 2005) (denying Rule 9019 motion despite assertion of business judgment rule because “it does not appear that the trustee critically evaluated this issue when he settled” and “clearly took a ‘their word/his word’ approach”); *In re Ortiz*, 619 B.R. 273, 277–78 (M.D. Fla. 2020) (finding trustee “failed to exercise [] reasonable business judgment” by failing to “look[] at the claims”); *Hanson Trust PLC v. ML SCM Acquisition, Inc.*, 781 F.2d 264, 276 (2d Cir. 1986) (finding business judgment rule inapplicable where directors failed to obtain “material information and in overseeing” advisor by “not seek[ing] any documents” underlying advisor’s “conclusory opinion”). Recognizing that the business judgment rule necessarily implicates evidence of subjective considerations, the Debtors offered affirmative testimony regarding their investigation and claimed it as the basis for their business judgment. *See* Dkt. 1298 ¶¶ 10, 14. Against this backdrop, the Committee & FCR have sought discovery to understand what information the Directors considered in deciding to approve the Settlement Agreement.

**Second**, despite resting their Settlement Motion on the Directors’ subjective analysis, Dkt. 1297 ¶ 84, the Debtors now claim that the only documents and information used to inform their Directors are off-limits because they were provided by counsel. That is the definition of using information as both a sword and a shield, and courts in similar circumstances have not hesitated to compel discovery into otherwise privileged information that a party has put at issue. *In re Trib.*, 2011 WL 386827 at \*7 (permitting discovery into “at issue” mediation communications regarding the “degree to which the Debtors . . . acted in good faith as estate fiduciaries to maximize recoveries” to “strike[] an appropriate balance [in] allowing discovery of potentially relevant information”); *In re Human Tissue Prod.*, 255 F.R.D. at 156 (holding that party could not “implicitly rely on the fruits of [counsel’s] investigation as evidence [of] diligence . . . while at the same time depriving plaintiffs of access to this information on the basis of privilege”); *Newmarkets Partners, LLC v. Sal. Oppenheim Jr. & Cie. S.C.A.*, 258 F.R.D. 95, 109–10 (S.D.N.Y. 2009) (holding that business judgment assertion put at issue privileged documents that “bear directly on whether [the director] exercised reasonable diligence in gathering and considering material information, and made an informed decision after a reasonable investigation”); *In re Consol. Litig. re Int’l Harvesters*, 666 F. Supp. 1148, 1151 (N.D. Ill. 1987) (finding testimony based on “investigat[ion]” by “our law department” waived privilege where party asserted “that it acted in good faith because it did what its attorneys counseled it to do”).

For example, in *In re Tribune Co.*, the Hon. Kevin J. Carey of the United States Bankruptcy Court for the District of Delaware addressed whether communications subject to the powerful mediation privilege were “at issue” in a request for plan approval that hinged on purportedly arms-length negotiations conducted through a mediation. 2011 WL 386827 at \*8. Judge Carey observed the need for “an appropriate balance between allowing discovery of potentially relevant

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information and protecting the confidentiality of the mediation” and permitted access to certain otherwise-protected communications between mediation parties. *Id.* (expanding scope of discoverable documents beyond limit sought by plan proponents). The same reasoning applies with even greater force here, where attorney-client and work product privilege has been used to shield the basis for the Debtors’ purportedly “well-informed” business judgment. Dkt. 1297 ¶ 90. In this case, counsel’s communications with the Directors concerning whether the Directors should settle the released claims and if so, on what terms, “necessarily bear on [the Directors’] opinion about whether or not to [take] such an action,” and thus are “material to whether [the Directors] acted on an informed basis.” *Newmarkets Partners, LLC.*, 258 F.R.D. at 108–10.

**Third**, the unique facts of this case confirm that the Debtors are seeking to exploit the business judgment standard to obtain unscrutinized approval of an insider settlement. There is substantial evidence that the Debtors’ corporate affiliate, NICO, engineered this bankruptcy to extinguish liability against **non-debtors**, thereby relieving itself of indemnification obligations to those non-debtors. *See generally* Dkt. 1293. As importantly, the Settlement Agreement releases direct claims the Debtors may have against their Berkshire affiliates, such as alter ego claims. The Debtors have put at issue—and the Committee & FCR are entitled to know—what the Directors were told by counsel with respect to the merits and value of the Debtors’ claims. Similarly, NICO’s influence on the process by which the Directors received and evaluated information—including via counsel’s communications with the Directors—is relevant to the Directors’ purported exercise of independence, particularly given that the Debtors’ post-petition strategy has focused on obtaining control over and releasing claims indemnified by NICO.

The Committee & FCR have conducted a robust investigation, through document requests and depositions conducted in the open, and laid out the initial results of their investigation (at least with respect to Successor Liability Claims) at length in the Standing Motion. Dkt. 1293. By contrast, the Directors—who presumably would have conducted a similar investigation if they were actually disinterested fiduciaries seeking to maximize the value of the Debtors’ causes of action—have cloaked their entire “investigation” in privilege and asked the Court to rubberstamp a “business judgment” that may be founded on nothing at all. This is not the path to a proper resolution of a settlement motion that should undoubtedly be analyzed under an entire fairness standard but which, according to the Debtors, must be granted on the basis of a presumption that can only be rebutted with information the Debtors have withheld.<sup>4</sup>

In short, the Debtors cannot on “one hand implicitly rely on the fruits of this background investigation as evidence that” the Directors “exercised [] diligence . . . while at the same time depriving [the Committee & FCR] of access to this information on the basis of privilege.” *In re Human Tissue Prods.*, 255 F.R.D. at 161. And should the Debtors object to the sufficiency of the record for this request, the Committee & FCR suggest *in camera* review. *Id.* at 158.

**Fourth**, the Debtors’ assertions of attorney work product protection are likewise waived. *Id.* at 162 (holding that party “impliedly waived . . . attorney work product privilege”). But even

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<sup>4</sup> Given the evidence the Committee & FCR have set forth in the Standing Motion, the “fiduciary exception” doctrine likewise supports the Committee’s & FCR’s request for discovery as to what the Directors knew or did not know when deciding to enter into the Settlement Agreement. Cf. *Off. Comm. of Asbestos Claimants of G-I Holding, Inc. v. Heyman*, 342 B.R. 416, 425 (S.D.N.Y. 2006) (noting that “debtor-in-possession has fiduciary duties to its estate, including creditors” and holding “it is appropriate to apply the *Garner* [fiduciary] exception and require [the debtor] to produce its documents withheld on the basis of the attorney-client privilege” to asbestos creditor committee).

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if Debtors have not waived work product protection, the Committee & FCR may pierce Debtors' work product protections because they have a "substantial need" for the documents the Directors relied upon in authorizing the Settlement and cannot obtain them from anywhere else. *See, e.g., In re Quigley Co.*, 2009 WL 9034027, at \*8 (granting committee access to work product to assess "bad faith of [debtor and affiliates] in pursuing the Plan," including as to "the lack of a legitimate ongoing business" and "value of the [affiliate's] contribution"); *Hartman v. Banks*, 164 F.R.D. 167, 170 (E.D. Pa. 1995) (piercing work product protection where "opinions and mental impressions of [defendant's officials] in handling the [] claim are directly at issue" and "the file kept by [defendant] may well contain crucial evidence on the central issues in the case"). Here, as in *Quigley*, the Committee & FCR need access to the only existing documents that show whether or not the Directors were adequately informed when they approved the Settlement Agreement.

***In any event***, even if the Debtors have not waived privilege or work product protection over their investigation by placing it at issue, the Court should at minimum preclude them from offering affirmative evidence about, or which resulted from, that investigation. *See In re Residential Cap., LLC*, 491 B.R. 63 (Bankr. S.D.N.Y. 2013); *Chesapeake Corp. v. Shore*, 771 A.2d 293, 301 (Del. Ch. 2000) (holding party could not use investigation as basis for reasonable business judgment after "having denied . . . the court any opportunity to determine" whether investigation was reasonable"). Indeed, *In re Residential Capital* dealt with circumstances very similar to this case: a settlement approval request under the business judgment rule. 491 B.R. at 70. The court there explained that the debtors were "walking a fine line" between waiver and preclusion, and ultimately held that "after having asserted the attorney-client privilege throughout discovery, the Debtors ***cannot now introduce the substance of whatever advice it sought and received in order to demonstrate that it exercised proper business judgment*** in approving the [] Settlement." *Id.* at 72. Accordingly, at minimum, the Debtors must be precluded from offering any affirmative evidence based on information provided by counsel to support or prevent rebuttal of their purported exercise of business judgment.

\* \* \*

For the reasons set forth above, the Committee & FCR request that the Court order the Debtors to produce unredacted copies of all documents and information relied on by the Debtors' directors in their review and approval of the Settlement Agreement and withheld by the Debtors on the basis of privilege or, in the alternative, be precluded from relying on such evidence.

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Dated: October 16, 2024

/s/ Arthur J. Abramowitz

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# EXHIBIT A

Exhibit A to TCC and FCR Letter  
(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
78570	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3189656	10/11/23 2:44 PM	WCD - Board Materials	WCD - Board Materials	Tim Pohl <trpadvisors2020@gmail.com>; Paul Aronzon <paronzon@icloud.com>; Raj B. Mehta <charles.sterrett@kirkland.com>	"Sterrett, Charles B." <rmmehtha@nationalindemnity.com>	Mohsin (Mo) Meghji <mmeghji@m3-partners.com>; "Sussberg, Josh" <jsussberg@kirkland.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Freedman, Max M." <max.freedman@kirkland.com>; "SVanAalten@coleschotz.com" <svanaalten@coleschotz.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
78571	Priv Withhold	Attorney Work Product	BNS-TCC-3189658	10/11/23 2:44 PM		WCD - August 8 Board Meeting Minutes KE Draft 10.11.2023.pdf				Meeting Minutes reflecting work performed by, or done at the direction of, counsel in anticipation of on in connection with litigation regarding the Debtors' chapter 11 proceedings.
78584	Priv Withhold	Attorney Work Product	BNS-TCC-3189676	11/19/23 3:48 PM		WCD - October 12 Board Meeting Minutes [K&E Draft 11-19-2023].pdf				Meeting Minutes reflecting work performed by, or done at the direction of, counsel in anticipation of on in connection with litigation regarding the Debtors' chapter 11 proceedings.
78586	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3189679	3/1/24 3:06 AM		WCD - Discussion Materials [K&E Draft 2.29.24].pdf				Presentation providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
78587	Priv Withhold	Attorney Work Product	BNS-TCC-3189689	3/1/24 3:06 AM		WCD - November 20 Board Meeting Minutes [K&E Draft 2-29-2024]_(102299533_2).PDF				Meeting Minutes reflecting work performed by, or done at the direction of, counsel in anticipation of on in connection with litigation regarding potential bankruptcy filing of Brilliant and/or subsidiaries.
78846	Priv Withhold	Attorney Work Product	BNS-TCC-3293640	5/18/23 4:16 PM		WCD - April 25 Board Meeting Minutes [K&E Draft 5-18-2023]_(96128426_3).pdf				Meeting Minutes reflecting work performed by, or done at the direction of, counsel in anticipation of on in connection with litigation regarding the Debtors' chapter 11 proceedings.
78861	Priv Withhold	Attorney Work Product	BNS-TCC-3293661	6/13/23 11:04 PM		WCD - May 18 Board Meeting Minutes [K&E Draft 6-12-2023]_(97522608_1).pdf				Meeting Minutes reflecting work performed by, or done at the direction of, counsel in anticipation of on in connection with litigation regarding the Debtors' chapter 11 proceedings.
78867	Priv Withhold	Attorney Work Product	BNS-TCC-3293664	7/19/23 1:14 AM		WCD - June 14 Board Meeting Minutes [K&E Draft 7-18-2023]_(98525964_2).pdf				Meeting Minutes reflecting work performed by, or done at the direction of, counsel in anticipation of on in connection with litigation regarding the Debtors' chapter 11 proceedings.
78868	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3293667	8/7/23 8:56 PM		WCD - July 19 Board Meeting Minutes [K&E Draft 8-7-2023]_(99057660_2).pdf				Meeting Minutes reflecting work performed by, or done at the direction of, counsel in anticipation of on in connection with litigation regarding the Debtors' chapter 11 proceedings.
78879	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3293726	10/12/23 3:05 PM	FW: WCD - Board Materials	FW: WCD - Board Materials	Mohsin (Mo) Meghji <mmeghji@m3-partners.com>	M3 WCD <wcd@m3-partners.com>		Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
78880	Priv Withhold	Attorney Work Product	BNS-TCC-3293729	10/12/23 3:05 PM		WCD - August 8 Board Meeting Minutes KE Draft 10.11.2023.pdf				Meeting Minutes reflecting work performed by, or done at the direction of, counsel in anticipation of on in connection with litigation regarding the Debtors' chapter 11 proceedings.

Exhibit A to TCC and FCR Letter  
(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
78882	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3293731	10/12/23 3:05 PM	FW: WCD - Board Materials FW: WCD - Board Materials	Mohsin (Mo) Meghji <mmejhji@m3-partners.com>	M3 WCD <wcd@m3-partners.com>			Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
78883	Priv Withhold	Attorney Work Product	BNS-TCC-3293734	10/12/23 3:05 PM		WCD - August 8 Board Meeting Minutes KE Draft 10.11.2023.pdf	"Tim Pohl" <trpadvisors2020@gmail.com>	"Freedman, Max M." <max.freeman@kirkland.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	Meeting Minutes reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79105	Priv Redact	Attorney-Client Privilege	BNS-TCC-3321721	5/15/23 7:40 PM	Re: WCD - Board Meeting	"Paul Aronzon" <paronzon@icloud.com>				Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.
79106	Priv Redact	Attorney-Client Privilege	BNS-TCC-3321722	5/15/23 7:42 PM	Re: WCD - Board Meeting	"Freedman, Max M." <max.freeman@kirkland.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>			Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.
79108	Priv Withhold	Attorney Work Product	BNS-TCC-3321727	5/18/23 11:16 AM		WCD - April 25 Board Meeting Minutes [K&E Draft 5-18-2023]_96128426_3.pdf				Meeting Minutes reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding potential bankruptcy filing of Brilliant and/or subsidiaries.
79109	Priv Redact	Attorney-Client Privilege	BNS-TCC-3321728	5/18/23 3:35 PM	Re: WCD - Board Materials	"Paul Aronzon" <paronzon@icloud.com>	"Freedman, Max M." <max.freeman@kirkland.com>			Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79112	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3321732	5/18/23 3:57 PM	RE: WCD - Board Materials	"Freedman, Max M." <max.freeman@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79123	Priv Redact	Attorney-Client Privilege	BNS-TCC-3321859	6/7/23 3:44 PM	Re: WCD - Board Meeting	"Freedman, Max M." <max.freeman@kirkland.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>			Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.
79124	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3321860	6/7/23 4:13 PM	RE: WCD - Board Meeting	"Freedman, Max M." <max.freeman@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79125	Priv Redact	Attorney-Client Privilege	BNS-TCC-3321862	6/7/23 6:39 PM	Re: WCD - Board Meeting	"Tim Pohl" <trpadvisors2020@gmail.com>	"Freedman, Max M." <max.freeman@kirkland.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>		Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.
79126	Priv Redact	Attorney-Client Privilege	BNS-TCC-3321863	6/8/23 12:42 PM	Re: WCD - Board Meeting	"Paul Aronzon" <paronzon@icloud.com>	"Max M. Freedman" <max.freeman@kirkland.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>		Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.
79129	Priv Withhold	Attorney Work Product	BNS-TCC-3321871	6/13/23 6:04 PM		WCD - May 18 Board Meeting Minutes [K&E Draft 6-12-2023]_97522608_1.pdf				Meeting Minutes reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79176	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3322585	9/3/23 1:38 PM	Re: WCD - Board Materials	"Paul Aronzon" <paronzon@icloud.com>	"Van Aalten, Seth" <SVanAalten@coleschotz.com>			Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79177 Priv Redact	Attorney-Client Privilege	BNS-TCC-3322589	9/5/23 2:10 PM Re: WCD - Board Matters		"Tim Pohl" <trpadvisors2020@gmail.com>	"Freedman, Max M." <max.freedman@kirkland.com>	"Raj Mehta" <rrmehta@nationalindemnity.com>;"paronzon@icloud.com" <paronzon@cloud.com>;"mmeghji@m3-partners.com" <mmeghji@m3-partners.com>;"Husnick, Chad J." <husnick@kirkland.com>;"Sussberg, Josh" <sussberg@kirkland.com>;"Sterrett, Charles B." <charles.sterrett@kirkland.com>			Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.
79178 Priv Redact	Attorney-Client Privilege	BNS-TCC-3322590	9/5/23 3:59 PM Re: WCD - Board Matters		"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Freedman, Max M." <max.freedman@kirkland.com>;"Raj Mehta" <rrmehta@nationalindemnity.com>;"mmeghji@m3-partners.com" <mmeghji@m3-partners.com>;"Husnick, Chad J." <husnick@kirkland.com>;"Sussberg, Josh" <sussberg@kirkland.com>;"Sterrett, Charles B." <charles.sterrett@kirkland.com>			Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.
79184 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3322718	9/20/23 3:24 PM RE: WCD - Board Materials		"Van Aalten, Seth" <SVanAalten@coleschotz.com>	"Raj Mehta" <rrmehta@nationalindemnity.com>;"Tim Pohl" <trpadvisors2020@gmail.com>;"paronzon@icloud.com" <paronzon@icloud.com>;"mmeghji@m3-partners.com" <mmeghji@m3-partners.com>	"Husnick, Chad J." <husnick@kirkland.com>;"Sussberg, Josh" <sussberg@kirkland.com>;"Zeiger, Jeffrey J." <jzeiger@kirkland.com>;"Campbell, Gavin" <gavin.campbell@kirkland.com>;"Sterrett, Charles B." <charles.sterrett@kirkland.com>;"Freedman, Max M." <max.freedman@kirkland.com>;"De Leo, Anthony" <ADELeo@coleschotz.com>;"Dean, David" <DDean@coleschotz.com>;"SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>;"Raj Mehta" <rrmehta@nationalindemnity.com>;"Tim Pohl" <trpadvisors2020@gmail.com>;"mmeghji@m3-partners.com" <mmeghji@m3-partners.com>;"Husnick, Chad J." <husnick@kirkland.com>;"Sussberg, Josh" <sussberg@kirkland.com>;"Zeiger, Jeffrey J." <jzeiger@kirkland.com>;"Campbell, Gavin" <gavin.campbell@kirkland.com>;"Sterrett, Charles B." <charles.sterrett@kirkland.com>;"Freedman, Max M." <max.freedman@kirkland.com>;"De Leo, Anthony" <ADELeo@coleschotz.com>;"Dean, David" <DDean@coleschotz.com>			Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79185 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3322721	9/20/23 4:36 PM Re: WCD - Board Materials		"Paul Aronzon" <paronzon@icloud.com>	"Husnick, Chad J." <husnick@kirkland.com>	"Raj Mehta" <rrmehta@nationalindemnity.com>;"Tim Pohl" <trpadvisors2020@gmail.com>;"mmeghji@m3-partners.com" <mmeghji@m3-partners.com>;"Husnick, Chad J." <husnick@kirkland.com>;"Sussberg, Josh" <sussberg@kirkland.com>;"Zeiger, Jeffrey J." <jzeiger@kirkland.com>;"Campbell, Gavin" <gavin.campbell@kirkland.com>;"Sterrett, Charles B." <charles.sterrett@kirkland.com>;"Freedman, Max M." <max.freedman@kirkland.com>;"De Leo, Anthony" <ADELeo@coleschotz.com>;"Dean, David" <DDean@coleschotz.com>			Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79187 Priv Redact	Attorney-Client Privilege	BNS-TCC-3322761	10/8/23 10:22 AM Re: WCD - Board Meeting		"Paul Aronzon" <paronzon@icloud.com>	"Freedman, Max M." <max.freedman@kirkland.com>				Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.

Exhibit A to TCC and FCR Letter  
(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79188 Priv Redact	Attorney-Client Privilege	Attorney-Client Privilege	BNS-TCC-3322762	10/8/23 11:11 AM	Re: WCD - Board Meeting	"Paul Aronzon" <paronzon@icloud.com>	"Freedman, Max M." <max.freedman@kirkland.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Mohsin (Mo) Meghji" <mmeghji@m3-partners.com>;"Sussberg, Josh" <jsussberg@kirkland.com>;"Husni ck, Chad J." <chusnick@kirkland.com>;"Freed man, Max M." <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.
79189 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3322766	10/11/23 9:44 AM	WCD - Board Materials	"Tim Pohl" <trpadvisors2020@gmail.com>;"P aul Aronzon" <paronzon@icloud.com>;"Raj B." <charles.sterrett@kirkland.com>	"Sterrett, Charles B." <paronzon@icloud.com>;"Raj Mehta" <rrmehta@nationalindemnity.com>	"Chad J." <chusnick@kirkland.com>;"Freed man, Max M." <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	"Mohsin (Mo) Meghji" <mmechji@m3-partners.com>;"Josh Sussberg" <jsussberg@kirkland.com>;"Chad J. Husnick" <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79190 Priv Withhold	Attorney Work Product	Attorney Work Product	BNS-TCC-3322767	10/11/23 9:44 AM	WCD - August 8 Board Meeting Minutes KE Draft 10.11.2023.pdf	"Tim Pohl" <trpadvisors2020@gmail.com>;"Raj Mehta" <rrmehta@nationalindemnity.com>;"Mohsin (Mo) Meghji" <mmechji@m3-partners.com>;"Josh Sussberg" <jsussberg@kirkland.com>;"Chad J. Husnick" <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	"Paul Aronzon" <paronzon@icloud.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>	"Chad J." <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79192 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3322791	10/11/23 11:03 AM	Re: WCD - Board Materials	"Tim Pohl" <trpadvisors2020@gmail.com>;"Raj Mehta" <rrmehta@nationalindemnity.com>;"Mohsin (Mo) Meghji" <mmechji@m3-partners.com>;"Josh Sussberg" <jsussberg@kirkland.com>;"Chad J. Husnick" <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	"Paul Aronzon" <paronzon@icloud.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>	"Chad J." <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79213 Priv Withhold	Attorney Work Product	Attorney Work Product	BNS-TCC-3322917	11/19/23 9:48 AM	WCD - October 12 Board Meeting Minutes [K&E Draft 11-19-2023].pdf	"Tim Pohl" <trpadvisors2020@gmail.com>;"Raj Mehta" <rrmehta@nationalindemnity.com>;"Mohsin (Mo) Meghji" <mmechji@m3-partners.com>;"Josh Sussberg" <jsussberg@kirkland.com>;"Chad J. Husnick" <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	"Paul Aronzon" <paronzon@icloud.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>	"Chad J." <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79226 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323144	2/29/24 9:06 PM	WCD - Discussion Materials [K&E Draft 2.29.24].pdf	"Tim Pohl" <trpadvisors2020@gmail.com>;"Raj Mehta" <rrmehta@nationalindemnity.com>;"Mohsin (Mo) Meghji" <mmechji@m3-partners.com>;"Josh Sussberg" <jsussberg@kirkland.com>;"Chad J. Husnick" <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	"Paul Aronzon" <paronzon@icloud.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>	"Chad J." <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79227 Priv Withhold	Attorney Work Product	Attorney Work Product	BNS-TCC-3323154	2/29/24 9:06 PM	WCD - November 20 Board Meeting Minutes [K&E Draft 2-29-2024]_102299533_2.PDF	"Tim Pohl" <trpadvisors2020@gmail.com>;"Raj Mehta" <rrmehta@nationalindemnity.com>;"Mohsin (Mo) Meghji" <mmechji@m3-partners.com>;"Josh Sussberg" <jsussberg@kirkland.com>;"Chad J. Husnick" <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	"Paul Aronzon" <paronzon@icloud.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>	"Chad J." <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding potential bankruptcy filing of Brilliant and/or subsidiaries.
79237 Priv Redact	Attorney-Client Privilege	Attorney-Client Privilege	BNS-TCC-3323281	5/2/24 4:58 PM	Re: WCD - Board Materials	"Tim Pohl" <trpadvisors2020@gmail.com>;"Raj Mehta" <rrmehta@nationalindemnity.com>;"Mohsin (Mo) Meghji" <mmechji@m3-partners.com>;"Josh Sussberg" <jsussberg@kirkland.com>;"Chad J. Husnick" <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	"Paul Aronzon" <paronzon@icloud.com>	"Freedman, Max M." <max.freedman@kirkland.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79240 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323284	5/2/24 9:48 PM	WCD - Presentation to Board re Merits of Successor Liability Claims47552586-2 003.PDF	"Tim Pohl" <trpadvisors2020@gmail.com>;"Raj Mehta" <rrmehta@nationalindemnity.com>;"Mohsin (Mo) Meghji" <mmechji@m3-partners.com>;"Josh Sussberg" <jsussberg@kirkland.com>;"Chad J. Husnick" <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	"Paul Aronzon" <paronzon@icloud.com>	"Freedman, Max M." <max.freedman@kirkland.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79254 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323354	5/15/24 9:50 AM	WCD - April 17, 2024 Board Meeting Minutes [K&E Draft 5.15.2024].pdf	"Tim Pohl" <trpadvisors2020@gmail.com>;"Raj Mehta" <rrmehta@nationalindemnity.com>;"Mohsin (Mo) Meghji" <mmechji@m3-partners.com>;"Josh Sussberg" <jsussberg@kirkland.com>;"Chad J. Husnick" <chusnick@kirkland.com>;"Max M. Freedman" <max.freedman@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	"Paul Aronzon" <paronzon@icloud.com>	"Freedman, Max M." <max.freedman@kirkland.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79255 Priv Redact	Attorney-Client Privilege	Attorney-Client Privilege	BNS-TCC-3323355	5/15/24 10:35 AM	Re: WCD - Board Minutes	"Paul Aronzon" <paronzon@icloud.com>	"Max M. Freedman" <max.freedman@kirkland.com>	**SVanAalten@coleschotz.com"	<paronzon@icloud.com>;"Tim Pohl"	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79257 Priv Redact	Attorney-Client Privilege; Attorney Work Product	WCD - Additional Berkshire	BNS-TCC-3323377	5/29/24 5:49 PM	Counsel	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Mohsin (Mo) Meghji" <mmeighji@m3-partners.com>	Husnick, Chad J."	<timrpohl@gmail.com>;"Tim Pohl"	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79258 Priv Redact	Attorney-Client Privilege; Attorney Work Product	WCD - TCC/FCR Counter	BNS-TCC-3323378	5/29/24 8:57 PM	[Privileged // Confidential]	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Raj Mehta" <rmehta@nationalindemnity.com>	"Husnick, Chad J." <chusnick@kirkland.com>;"Sussberg, Josh"	<trpadvisors2020@gmail.com>;"Tim Pohl"	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79262 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	WCD - May 15, 2024 Board Meeting Minutes [K&E Draft 6-11-2024]_109779583_2.PDF	BNS-TCC-3323411	6/12/24 6:59 AM						Meeting Minutes
79263 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	WCD - May 28, 2024 Board Meeting Minutes [K&E Draft 6-11-2024]_109780011_1.PDF	BNS-TCC-3323412	6/12/24 6:59 AM						Meeting Minutes
79264 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	WCD - May 2, 2024 Disinterested Director Meeting Minutes [K&E Draft 6-12-2024]_108330080_1.PDF	BNS-TCC-3323416	6/12/24 7:05 AM						Meeting Minutes requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79265 Priv Redact	Attorney-Client Privilege; Attorney Work Product	WCD - Disinterested Director Meeting Minutes [K&E Draft 6-12-2024]_108330080_1.PDF	BNS-TCC-3323417	6/12/24 4:22 PM	RE: WCD - Board Meeting	"Freedman, Max M." <max.freedman@kirkland.com>;"Sussberg, Josh" <jsussberg@kirkland.com>;"SVanAalten@coleschotz.com"	"Raj Mehta" <rmehta@nationalindemnity.com>	"Husnick, Chad J." <chusnick@kirkland.com>;"Sussberg, Josh"	<trpadvisors2020@gmail.com>;"Tim Pohl"	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79267 Priv Redact	Attorney-Client Privilege	RE: WCD - Disinterested Director Meeting	BNS-TCC-3323427	6/17/24 2:49 PM		"Freedman, Max M." <max.freedman@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	"Tim Pohl" <timrpohl@gmail.com>;"Mohsin (Mo) Meghji" <mmeighji@m3-partners.com>;"Husnick, Chad J." <chusnick@kirkland.com>;"Sussberg, Josh"	<jsussberg@kirkland.com>;"Sterrett, Charles B." <charles.sterrett@kirkland.com>	Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79270 Priv Redact	Attorney-Client Privilege	Attorney-Client Privilege	BNS-TCC-3323434	6/26/24 1:42 PM	RE: WCD - Disinterested Director Meeting	"Freedman, Max M." <max.freedman@kirkland.com>	"Tim Pohl" <tvpadvisors2020@gmail.com>; Paul Aronzon <paronzon@icloud.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Sussberg, Josh" <jsussberg@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; "Sterrett, Charles B." <charles.sterrett@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>	Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.  Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79271 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323438	6/26/24 1:42 PM	WCD - June 18_2024 Disinterested Director Meeting Minutes [K&E Draft 6.26.24].pdf				"Freedman, Max M." <max.freedman@kirkland.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Sussberg, Josh" <jsussberg@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; "Sterrett, Charles B." <charles.sterrett@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79272 Priv Redact	Attorney-Client Privilege	Attorney-Client Privilege	BNS-TCC-3323439	6/26/24 2:29 PM	Re: WCD - Disinterested Director Meeting	"Paul Aronzon" <paronzon@icloud.com>	"Tim Pohl" <tvpadvisors2020@gmail.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Sussberg, Josh" <jsussberg@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; "Sterrett, Charles B." <charles.sterrett@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>	Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.  Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79273 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323444	6/30/24 7:33 PM	Re: WCD - Proposed Counteroffer	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>		"Husnick, Chad J." <chusnick@kirkland.com>; "Sussberg, Josh" <jsussberg@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; "Sterrett, Charles B." <charles.sterrett@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79274 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323446	6/30/24 7:36 PM	Re: WCD - Proposed Counteroffer	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Sussberg, Josh" <jsussberg@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; "Sterrett, Charles B." <charles.sterrett@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79279 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323466	7/1/24 5:09 PM	Re: WCD - Proposed Counteroffer	"Tim Pohl" <tvpadvisors2020@gmail.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Sussberg, Josh" <jsussberg@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; "Sterrett, Charles B." <charles.sterrett@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79280 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323468	7/1/24 5:14 PM	RE: WCD - Proposed Counteroffer	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <tvpadvisors2020@gmail.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Sussberg, Josh" <jsussberg@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; "Sterrett, Charles B." <charles.sterrett@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79281 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323477	7/3/24 1:03 PM	Re: WCD - Proposed Counteroffer	"Tim Pohl" <tvpadvisors2020@gmail.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Sussberg, Josh" <jsussberg@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; "Sterrett, Charles B." <charles.sterrett@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	

Exhibit A to TCC and FCR Letter  
(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79282	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323480	7/3/24 1:06 PM	RE: WCD - Proposed Counteroffer	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>	"Husnick, Chad J." <chusnick@kirkland.com>		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79283	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323483	7/3/24 1:52 PM	Re: WCD - Proposed Counteroffer	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>			Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79284	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323487	7/3/24 2:08 PM	Re: WCD - Proposed Counteroffer	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>			Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79285	Priv Redact	Attorney-Client Privilege	BNS-TCC-3323498	7/8/24 1:14 PM	Re: WCD	"Tim Pohl" <trpadvisors2020@gmail.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>;"Husnick, Chad J." <chusnick@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79286	Priv Redact	Attorney-Client Privilege	BNS-TCC-3323500	7/8/24 1:26 PM	Re: WCD	"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>;"Husnick, Chad J." <chusnick@kirkland.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>;"Husnick, Chad J." <chusnick@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79287	Priv Redact		BNS-TCC-3323503	7/8/24 1:30 PM	RE: WCD	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <paronzon@icloud.com>;"Husnick, Chad J." <chusnick@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>;"Charles B. Sterrett" <charles.sterrett@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79288	Priv Redact	Attorney-Client Privilege	BNS-TCC-3323509	7/9/24 8:19 AM	Re:	"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>;"Husnick, Chad J." <chusnick@kirkland.com>;"Charles B. Sterrett" <charles.sterrett@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79289	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323511	7/10/24 6:52 AM		WCD - June 12, 2024 Board Meeting Minutes [K&E Draft 7-9-2024]_110653137_1.PDF				Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79290	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323514	7/10/24 6:54 AM		WCD - June 26, 2024 Disinterested Director Meeting Minutes [K&E Draft 7-9-2024]_110654092_1.PDF				Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79291	Priv Redact	Attorney-Client Privilege	BNS-TCC-3323521	7/10/24 10:10 AM	Re: WCD - Disinterested Director Minutes	"Paul Aronzon" <paronzon@icloud.com>	"Max M. Freedman" <max.freedman@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>;"Mohsin Meghji" <mohsin.meghji@m3-partners.com>;"Chad J. Husnick" <chusnick@kirkland.com>;"Josh Sussberg" <jssussberg@kirkland.com>;"Charles B. Sterrett" <charles.sterrett@kirkland.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>;"Husnick, Chad J." <chusnick@kirkland.com>;"Charles B. Sterrett" <charles.sterrett@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79292 Priv Redact	Attorney-Client Privilege	BNS-TCC-3323523	7/10/24 10:12 AM Re: WCD - Board Materials		"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Max M. Freedman" <max.freedman@kirkland.com>; Raj Mehta <rmehta@nationalindemnity.com>; "Mohsin Meghji" <mmejhji@m3-partners.com>; "Chad J. Husnick" <chusnick@kirkland.com>; Josh Sussberg <jsussberg@kirkland.com>; Charles B. Sterrett <charles.sterrett@kirkland.com>	"Sussberg, Charles B." <charles.sterrett@kirkland.com>; "Charles B. Sterrett" <charles.sterrett@kirkland.com>	Email Chain providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.	
79293 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323534	7/11/24 12:26 PM RE: We		"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>				Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79294 Priv Redact	Attorney-Client Privilege	BNS-TCC-3323535	7/11/24 12:48 PM		"Paul Aronzon" <paronzon@icloud.com>	"Charles Sterrett" <charles.sterrett@kirkland.com>				Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79295 Priv Redact		BNS-TCC-3323537	7/11/24 12:51 PM Re:		"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>				Email Chain providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79296 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323538	7/11/24 4:15 PM		"Paul Aronzon" <paronzon@icloud.com>	"Charles Sterrett" <charles.sterrett@kirkland.com>				Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.
79297 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323539	RE: Privileged & 7/11/24 4:20 PM Confidential		"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>				Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79298 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323548	Re: Privileged & 7/11/24 4:27 PM Confidential		"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>				Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79299 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323549	Re: Privileged & 7/11/24 5:10 PM Confidential		"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>				Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79300 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323550	Re: Privileged & 7/11/24 5:12 PM Confidential		"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	"Tim Pohl" <timrpohl@gmail.com>		Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79301 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323555	RE: WCD; Privileged and 7/12/24 1:06 PM Confidential		"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <timrpohl@gmail.com>				Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

Exhibit A to TCC and FCR Letter  
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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79302 Priv Redact		Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323557	7/12/24 1:06 PM		2024.07.12 Board Presentation Final.pdf				Presentation requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79303 Priv Redact		Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323559	7/12/24 3:54 PM	RE: WCD; Privileged and Confidential		"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <timrpohl@gmail.com>; "Paul Aronzon" <paronzon@icloud.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79306 Priv Withhold		Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323563	7/12/24 3:54 PM		WCD - One Page Overview Summary KE Draft 7.12.2024 v2.pdf				Presentation providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79309 Priv Redact		Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323566	7/15/24 11:22 AM	Re: Whittaker - Debtors // Non-Debtors [FRE 408] Privileged & Confidential		"Tim Pohl" <timrpohl@gmail.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <zeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>; "Freezman, Max M." <max.freeman@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79310 Priv Redact		Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323571	7/15/24 8:57 PM	Re: Whittaker - Debtors // Non-Debtors [FRE 408] Privileged & Confidential		"Paul Aronzon" <paronzon@icloud.com>	"Freedman, Max M." <max.freeman@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Sterrett, Charles B." <charles.sterrett@kirkland.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79311 Priv Redact	Attorney-Client Privilege		BNS-TCC-3323577	7/16/24 9:16 AM	RE: Whittaker, Clark & Daniels, Inc., et al. Case No.23-13575		"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; "Husnick, Chad J." <chusnick@kirkland.com>		Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79312 Priv Redact	Attorney-Client Privilege		BNS-TCC-3323579	7/16/24 9:24 AM	Re: Whittaker, Clark & Daniels, Inc., et al. Case No.23-13575		"Tim Pohl" <trpadvisors2020@gmail.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>; "Husnick, Chad J." <chusnick@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79313 Priv Redact	Attorney-Client Privilege		BNS-TCC-3323581	7/16/24 9:24 AM	Re: Whittaker, Clark & Daniels, Inc., et al. Case No.23-13575		"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Chad J. Husnick" <chusnick@kirkland.com>; "Charles B. Sterrett" <charles.sterrett@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79314 Priv Redact	Attorney-Client Privilege		BNS-TCC-3323582	7/16/24 9:29 AM	Re: Whittaker, Clark & Daniels, Inc., et al. Case No.23-13575		"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; "Husnick, Chad J." <chusnick@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79315 Priv Redact	Attorney-Client Privilege		BNS-TCC-3323585	7/16/24 9:50 AM	RE: Whittaker, Clark & Daniels, Inc., et al. Case No.23-13575		"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; "Husnick, Chad J." <chusnick@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79316 Priv Redact	Attorney-Client Privilege		BNS-TCC-3323587	7/16/24 10:39 AM	RE: Whittaker, Clark & Daniels, Inc., et al. Case No.23-13575		"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; "Husnick, Chad J." <chusnick@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.

Exhibit A to TCC and FCR Letter  
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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79317 Priv Redact	Attorney-Client Privilege; Attorney Work Product	WCD - Disinterested Director Materials	BNS-TCC-3323589	7/17/24 9:57 AM	[Privileged and Confidential]	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>; "Tim Pohl" <trpadvisors2020@gmail.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger , Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79318 Priv Redact	Attorney-Client Privilege; Attorney Work Product	WCD - Board Materials - Disinterested Director Discussion Materials.pdf	BNS-TCC-3323590	7/17/24 9:57 AM				"Sterrett, Charles B." <charles.sterrett@kirkland.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger , Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79319 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Re: WCD - Disinterested Director Materials	BNS-TCC-3323595	7/17/24 10:59 AM	[Privileged and Confidential]	"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger , Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79320 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Re: WCD - Disinterested Director Materials	BNS-TCC-3323596	7/17/24 10:59 AM	[Privileged and Confidential]	"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger , Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79322 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Re: WCD - Disinterested Director Materials	BNS-TCC-3323602	7/17/24 12:26 PM	[Privileged and Confidential]	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger , Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79324 Priv Redact	Attorney-Client Privilege; Attorney Work Product	RE: WCD - Disinterested Director Materials	BNS-TCC-3323609	7/18/24 11:34 AM	[Privileged and Confidential]	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; "Paul Aronzon" <paronzon@icloud.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger , Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79325 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	WCD - COVID Discussion Slide 7.18.2024.pdf	BNS-TCC-3323613	7/18/24 11:34 AM						Presentation providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79326 Priv Redact	Attorney-Client Privilege; Attorney Work Product	WCD - Board Materials - 7.18.2024 Disinterested Director Discussion Materials KE Draft 7.18.2024 v2.pdf	BNS-TCC-3323614	7/18/24 11:34 AM						Presentation providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79327	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323618	7/18/24 4:12 PM	Re: WCD - Disinterested Director Materials [Privileged and Confidential]	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>			Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79328	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323622	7/18/24 4:25 PM	Re: WCD - Disinterested Director Materials [Privileged and Confidential]	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	"Paul Aronzon" <paronzon@icloud.com>		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79329	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323627	7/19/24 11:40 AM	Re: WCD - Disinterested Director Materials [Privileged and Confidential]	"Tim Pohl" <trpadvisors2020@gmail.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79330	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323637	7/19/24 11:56 AM	RE: WCD - Disinterested Director Materials [Privileged and Confidential]	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Paul Aronzon" <paronzon@icloud.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79331	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323666	7/23/24 9:56 AM	WCD - July 22, 2024 Disinterested Director Meeting Minutes [K&E Draft 7-22-2024]_111288730_2.PDF					Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79332	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323667	7/23/24 9:56 AM	WCD - July 16, 2024 Disinterested Director Meeting Minutes [K&E Draft 7-22-2024]_110848726_2.PDF					Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79333	Priv Redact	Attorney-Client Privilege	BNS-TCC-3323668	7/23/24 10:19 AM	Re: WCD - Disinterested Director Session	"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Freedman, Max M." <max.freedman@kirkland.com>	"Freedman, Max M." <max.freedman@kirkland.com>	Email Chain providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79334	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323671	7/23/24 4:24 PM	I am	"Tim Pohl" <timrpohl@gmail.com>	"Chad J. Husnick" <chusnick@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	"Paul Aronzon" <paronzon@icloud.com>	Email providing/requesting/containing legal advice regarding the Debtors' chapter 11 proceedings.
79335	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323672	7/23/24 4:34 PM	Re: I am	"Tim Pohl" <timrpohl@gmail.com>	"Husnick, Chad J." <chusnick@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	"Paul Aronzon" <paronzon@icloud.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79336 Priv Redact	Attorney-Client Privilege; Attorney Work Product		BNS-TCC-3323673	7/23/24 4:38 PM Re: I am		"Tim Pohl" <timrpohl@gmail.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Paul Aronzon" <paronzon@icloud.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>			Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79337 Priv Redact	Attorney-Client Privilege; Attorney Work Product		BNS-TCC-3323675	7/23/24 6:20 PM Re: I am		"Tim Pohl" <timrpohl@gmail.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Paul Aronzon" <paronzon@icloud.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>			Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79338 Priv Redact	Attorney-Client Privilege; Attorney Work Product		BNS-TCC-3323678	7/24/24 10:55 AM WCD		"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <timrpohl@gmail.com>; "Paul Aronzon" <paronzon@icloud.com>	"Gavin, Mac A."	"gavin.campbell@kirkland.com"; "SVanAalten@coleschotz.com"; "SVanAalten@coleschotz.com"; "Bank, Mac A."	Email requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79339 Priv Redact	Attorney-Client Privilege; Attorney Work Product		BNS-TCC-3323679	7/24/24 10:55 AM	WCD - Board Materials - 7.24.2024 Disinterested Director Discussion Materials.pdf				"Paul Aronzon" <paronzon@icloud.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "SVanAalten@coleschotz.com"; "SVanAalten@coleschotz.com"; "Bank, Mac A."	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79340 Priv Redact	Attorney-Client Privilege; Attorney Work Product		BNS-TCC-3323681	7/24/24 11:23 AM Re: WCD		"Tim Pohl" <timrpohl@gmail.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "SVanAalten@coleschotz.com"; "SVanAalten@coleschotz.com"; "Bank, Mac A."	"Paul Aronzon" <paronzon@icloud.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "SVanAalten@coleschotz.com"; "SVanAalten@coleschotz.com"; "Bank, Mac A."	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79341 Priv Redact	Attorney-Client Privilege; Attorney Work Product		BNS-TCC-3323682	7/24/24 11:35 AM Re: WCD		"Tim Pohl" <timrpohl@gmail.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "SVanAalten@coleschotz.com"; "SVanAalten@coleschotz.com"; "Bank, Mac A."	"Tim Pohl" <timrpohl@gmail.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "SVanAalten@coleschotz.com"; "SVanAalten@coleschotz.com"; "Bank, Mac A."	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79342 Priv Redact	Attorney-Client Privilege; Attorney Work Product		BNS-TCC-3323684	7/24/24 11:37 AM Re: WCD		"Paul Aronzon" <paronzon@icloud.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "SVanAalten@coleschotz.com"; "SVanAalten@coleschotz.com"; "Bank, Mac A."	"Paul Aronzon" <paronzon@icloud.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "SVanAalten@coleschotz.com"; "SVanAalten@coleschotz.com"; "Bank, Mac A."	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79344	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323689	7/24/24 11:55 AM	Re: WCD	"Tim Pohl" <timrpohl@gmail.co>	"Sterrett, Charles B." m>	<charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>; "Husnick , Chad J." <chusnick@kirkland.com>; "Zeiger , Jeffrey J." <jzeiger@kirkland.com>; "Campbe ll, Gavin" <gavin.campbell@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79345	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323693	7/24/24 12:04 PM	Re: WCD	"Tim Pohl" <timrpohl@gmail.co>	"Sterrett, Charles B." m>	<charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>; "Husnick , Chad J." <chusnick@kirkland.com>; "Zeiger , Jeffrey J." <jzeiger@kirkland.com>; "Campbe ll, Gavin" <gavin.campbell@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79348	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323716	7/24/24 5:34 PM		WCD - July 22, 2024 Disinterested Director Meeting Minutes [Final] Compiled.pdf				Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79349	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323721	7/24/24 5:34 PM		WCD - May 2, 2024 Disinterested Director Meeting Minutes [Final] Compiled.pdf				Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79350	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323723	7/24/24 5:34 PM		WCD - June 26, 2024 Disinterested Director Meeting Minutes [Final] Compiled.pdf				Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79351	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323735	7/24/24 5:34 PM		WCD - July 16, 2024 Disinterested Director Meeting Minutes [Final] Compiled.pdf				Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79352	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323736	7/24/24 5:34 PM		WCD - June 18, 2024 Disinterested Director Meeting Minutes [Final] Compiled.pdf				Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79353 Priv Redact	Attorney-Client Privilege; Attorney Work Product		BNS-TCC-3323745	7/25/24 7:05 AM	Re: WCD	"Tim Pohl" <timrpohl@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com> "Bank, Mac A." <mac.bank@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "SVanAalten, Coleschotz, S Van Aalten" <SVanAalten@coleschotz.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email Chain requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79354 Priv Redact	Attorney-Client Privilege; Attorney Work Product		BNS-TCC-3323775	7/25/24 8:05 AM	Re: WCD	"Tim Pohl" <timrpohl@gmail.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	"Gavin" <gavin.campbell@kirkland.com>; "SVanAalten, Coleschotz, S Van Aalten" <SVanAalten@coleschotz.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79355 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Re: WCD - Disinterested Director Materials	BNS-TCC-3323778	7/25/24 8:26 AM	[Privileged and Confidential]	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	"Gavin" <gavin.campbell@kirkland.com>; "SVanAalten, Coleschotz, S Van Aalten" <SVanAalten@coleschotz.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79356 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Re: WCD - Disinterested Director Materials	BNS-TCC-3323783	7/25/24 8:26 AM	[Privileged and Confidential]	"Tim Pohl" <trpadvisors2020@gmail.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	"Gavin" <gavin.campbell@kirkland.com>; "SVanAalten, Coleschotz, S Van Aalten" <SVanAalten@coleschotz.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79358 Priv Redact	Attorney-Client Privilege; Attorney Work Product	Re: WCD - Disinterested Director Materials	BNS-TCC-3323794	7/26/24 10:30 AM	[Privileged and Confidential]	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Charles Sterrett" <charles.sterrett@kirkland.com>; "Tim Pohl" <trpadvisors2020@gmail.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	"Gavin" <gavin.campbell@kirkland.com>; "SVanAalten, Coleschotz, S Van Aalten" <SVanAalten@coleschotz.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79359 Priv Redact	Attorney-Client Privilege; Attorney Work Product		BNS-TCC-3323800	7/29/24 5:21 PM		"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	"Gavin" <gavin.campbell@kirkland.com>; "SVanAalten, Coleschotz, S Van Aalten" <SVanAalten@coleschotz.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79360 Priv Redact	Attorney-Client Privilege; Attorney Work Product		BNS-TCC-3323801	7/29/24 5:21 PM	Re: WCD	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; "Husnick, Chad J." <chusnick@kirkland.com>; "Zeiger, Jeffrey J." <jzeiger@kirkland.com>; "Campbell, Gavin" <gavin.campbell@kirkland.com>; "Bank, Mac A." <mac.bank@kirkland.com>	"Gavin" <gavin.campbell@kirkland.com>; "SVanAalten, Coleschotz, S Van Aalten" <SVanAalten@coleschotz.com>; "Bank, Mac A." <mac.bank@kirkland.com>	Email requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79361	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323802	7/29/24 5:38 PM	Re: WCD	"Paul Aronzon" <paronzon@icloud.com>	"Husnick, Chad J." <chusnick@kirkland.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>; Tim Pohl" <trpadvisors2020@gmail.com>; ampbell, Gavin" <gavin.campbell@kirkland.com>; Bank, Mac A." <mac.bank@kirkland.com>	Email requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79362	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323803	7/29/24 6:06 PM	Re: Whittaker - Debtors // Non-Debtors [FRE 408]	"Tim Pohl" <trpadvisors2020@gmail.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>; Husnick, Chad J." <chusnick@kirkland.com>; Zeiger, Jeffrey J." <zeiger@kirkland.com>; Campbell, Gavin" <gavin.campbell@kirkland.com>; SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; Bank, Mac A." <mac.bank@kirkland.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79363	Priv Redact	Attorney-Client Privilege	BNS-TCC-3323819	7/31/24 8:28 AM	Update	"Tim Pohl" <timrpohl@gmail.com>	"Chad J. Husnick" <chusnick@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.
79364	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323820	7/31/24 10:37 AM	Re: Whittaker - Debtors // Non-Debtors [FRE 408]	"Paul Aronzon" <paronzon@icloud.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>; Zeiger, Jeffrey J." <zeiger@kirkland.com>; Campbell, Gavin" <gavin.campbell@kirkland.com>; SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; Bank, Mac A." <mac.bank@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79365	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323828	7/31/24 10:39 AM	RE: Whittaker - Debtors // Non-Debtors [FRE 408]	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	"Husnick, Chad J." <chusnick@kirkland.com>; Zeiger, Jeffrey J." <zeiger@kirkland.com>; Campbell, Gavin" <gavin.campbell@kirkland.com>; SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; Bank, Mac A." <mac.bank@kirkland.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79366	Priv Redact		BNS-TCC-3323839	7/31/24 4:17 PM	Dont	"Tim Pohl" <timrpohl@gmail.com>	"Chad J. Husnick" <chusnick@kirkland.com>	"Charles B. Sterrett" <charles.sterrett@kirkland.com>; Chad J. Husnick" <chusnick@kirkland.com>; Paul Aronzon" <paronzon@icloud.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.	
79367	Priv Redact	Attorney-Client Privilege	BNS-TCC-3323861	8/5/24 5:53 PM	Tom	"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Husnick, Chad J." <chusnick@kirkland.com>; Tim Pohl" <trpadvisors2020@gmail.com>	Email providing/requesting/containing information necessary for the rendering of legal advice regarding the Debtors' chapter 11 proceedings.	
79368	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323862	8/5/24 6:49 PM	Re: Tom	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>; Tim Pohl" <trpadvisors2020@gmail.com>	Email Chain requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79369 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323866	8/5/24 6:57 PM Re: Tom			"Paul Aronzon" <paronzon@icloud.com>	"Husnick, Chad J." <chusnick@kirkland.com>;"Sterrett, Charles B." <charles.sterrett@kirkland.com>			Email Chain requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79370 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323869	8/7/24 1:38 PM Re: WCD [Privileged and Confidential]			"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>;"Husnick, Chad J." <chusnick@kirkland.com>			Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79371 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323872	8/7/24 1:49 PM Re: WCD [Privileged and Confidential]			"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>;"Husnick, Chad J." <chusnick@kirkland.com>			Email Chain requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79372 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323874	8/7/24 1:49 PM Re: WCD [Privileged and Confidential]			"Paul Aronzon" <paronzon@icloud.com>	"Tim Pohl" <trpadvisors2020@gmail.com>;"Husnick, Chad J." <chusnick@kirkland.com>			Email Chain requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79375 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323892	8/7/24 2:50 PM WCD - Privileged and Confidential			"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>;"Tim Pohl" <trpadvisors2020@gmail.com>	"Husnick, Chad J." <chusnick@kirkland.com>;"Campbell, Gavin" <gavin.campbell@kirkland.com>;"Bank, Mac A." <mac.bank@kirkland.com>		Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79376 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323893	8/7/24 2:50 PM		WCD - DD Materials - Proposed Settlement and DIP Terms Overview [8-7-2024].PDF					Presentation providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79377 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323900	8/8/24 7:41 AM Re: WCD - Privileged and Confidential			"Tim Pohl" <trpadvisors2020@gmail.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>;"Campbell, Gavin" <gavin.campbell@kirkland.com>;"Bank, Mac A." <mac.bank@kirkland.com>		Email Chain requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79378 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323901	8/8/24 10:11 PM RE: WCD - Privileged and Confidential			"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>;"Paul Aronzon" <paronzon@icloud.com>	"Husnick, Chad J." <chusnick@kirkland.com>;"Campbell, Gavin" <gavin.campbell@kirkland.com>;"Bank, Mac A." <mac.bank@kirkland.com>		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79380 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323911	8/8/24 10:11 PM		WCD - Illustrative Chapter 11 Plan Term Sheet KE Draft 8.8.24.docx					Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79381	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323912	8/8/24 10:11 PM		WCD - 9019 Settlement - Agreement [K&E Draft 8.8.2024].docx				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79382	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323913	8/8/24 10:11 PM		WCD - 9019 Settlement - Proposed Order [K&E Draft 8.8.2024].docx				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79383	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323914	8/9/24 7:03 AM	Re: WCD - Privileged and Confidential	"Tim Pohl" <trpadvisors2020@gmail.com>	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>; Husnick, Chad J. <chusnick@kirkland.com>; Campbell, Gavin <gavin.campbell@kirkland.com>; Bank, Mac A. <mac.bank@kirkland.com> "Sussberg, Josh" <jsussberg@kirkland.com>; Husnick, Chad J. <chusnick@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>; Zeiger, Jeffrey J. <zeiger@kirkland.com>; Manning, Rex <rex.manning@kirkland.com>; Campbell, Gavin <gavin.campbell@kirkland.com>; Sterrett, Charles B. <charles.sterrett@kirkland.com>; Bank, Mac A. <mac.bank@kirkland.com>		Email Chain requesting/providing information necessary for the rendering of legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79384	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323917	8/13/24 12:36 PM	WCD - Successor Liability Ruling	"Freedman, Max M." <max.freedman@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; Paul Aronzon <paronzon@icloud.com>; Mohsin (Mo) Meghji <mmeghji@m3-partners.com>	"Husnick, Chad J." <chusnick@kirkland.com>; Campbell, Gavin <gavin.campbell@kirkland.com>; Sterrett, Charles B. <charles.sterrett@kirkland.com>; Bank, Mac A. <mac.bank@kirkland.com>		Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79385	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323963	8/13/24 12:42 PM	RE: WCD - Privileged and Confidential	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; Paul Aronzon <paronzon@icloud.com>	"SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79388	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323968	8/13/24 12:47 PM	Re: WCD - Successor Liability Ruling	"Paul Aronzon" <paronzon@icloud.com>	"Max M. Freedman" <max.freedman@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>; Campbell, Gavin <gavin.campbell@kirkland.com>; Bank, Mac A. <mac.bank@kirkland.com>; "SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>		Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79389	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3323970	8/14/24 10:28 PM	RE: WCD - Privileged and Confidential	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Tim Pohl" <trpadvisors2020@gmail.com>; Paul Aronzon <paronzon@icloud.com>	"SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>		Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79390 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324075	Re: WCD - Privileged and 8/15/24 9:01 AM Confidential		"Paul Aronzon" <paronzon@icloud.com>		"Tim Pohl" <trpadvisors2020@gmail.com>		"Sterrett, Charles B." <charles.sterrett@kirkland.com>; Husnick, Chad J." <husnick@kirkland.com>;"Camp bell, Gavin" <gavin.campbell@kirkland.com>;" Bank, Mac A." <mac.bank@kirkland.com>;"SVan Aalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79391 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324082	Re: WCD - Pohl Declarations (Privileged & 8/15/24 9:30 AM Confidential)		"Tim Pohl" <trpadvisors2020@ "Bank, Mac A." gmail.com>		"Bank, Mac A." <mac.bank@kirkland.com>		"Husnick, Chad J." <husnick@kirkland.com>;"Sterret t, Charles B." <charles.sterrett@kirkland.com>; Zeiger, Jeffrey J." <zeiger@kirkland.com>;"Campbe ll, Gavin" <gavin.campbell@kirkland.com>;" Schryver, Gavin D." <gavin.schryver@kirkland.com>;" SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79392 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324083	RE: WCD - Privileged and 8/15/24 3:54 PM Confidential		"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>;"Tim Pohl" <trpadvisors2020@gmail.com>	"Bank, Mac A." <mac.bank@kirkland.com>;"SVa nAalten@coleschotz.com" <SVanAalten@coleschotz.com>		"Husnick, Chad J." <husnick@kirkland.com>;"Zeiger , Jeffrey J." <zeiger@kirkland.com>;"Campbe ll, Gavin" <gavin.campbell@kirkland.com>;" Schryver, Gavin D." <gavin.schryver@kirkland.com>;" Bank, Mac A." <mac.bank@kirkland.com>;"SVa nAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings. Draft agreement
79393 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324091	Incremental Redline - WCD - 9019 Settlement - Agreement - KE Draft 8.15.24 to NICO Draft 8.14.24.pdf 8/15/24 3:54 PM							Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79394 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324092	WCD - Illustrative Chapter 11 Plan Term Sheet [KE Draft 8.15.24].docx 8/15/24 3:54 PM							Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79395 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324093	WCD - 9019 Settlement - Agreement [KE Draft 8.15.2024].docx 8/15/24 3:54 PM							Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79396 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324094	Incremental Redline - WCD - Illustrative Chapter 11 Plan Term Sheet - KE Draft 8.15.24 to NICO Draft 8.14.24.pdf 8/15/24 3:54 PM							Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79397	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324095	8/15/24 3:54 PM		Cumulative Redline - WCD - 9019 Settlement - Agreement - KE Draft 8.15.24 to KE Draft 8.8.24.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79398	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324096	8/15/24 3:54 PM		Incremental Redline - WCD - 9019 Settlement - Proposed Order - KE Draft 8.15.24 to NICO Draft 8.14.24.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79399	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324097	8/15/24 3:54 PM		Cumulative Redline - WCD - Illustrative Chapter 11 Plan Term Sheet - KE Draft 8.15.24 to KE Draft 8.8.24.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79400	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324098	8/15/24 3:54 PM		WCD - 9019 Settlement - Proposed Order [KE Draft 8.15.2024].docx				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79401	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324099	8/15/24 3:54 PM		Cumulative Redline - WCD - 9019 Settlement - Proposed Order - KE Draft 8.15.24 to KE Draft 8.8.24.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79404	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324102	8/16/24 12:10 PM	Re: WCD - Aronzon Declaration (Privileged & Confidential)	"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com> "Pohl, Tim" <trpadvisors2020@gmail.com>	"Husnick, Chad J." <chusnick@kirkland.com>;"Sterrett, Charles B." <charles.sterrett@kirkland.com>;"Zeiger, Jeffrey J." <jzeiger@kirkland.com>;"Campbell, Gavin" <gavin.campbell@kirkland.com>;"Schryver, Gavin D." <gavin.schryver@kirkland.com>;"SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79405	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324103	8/16/24 10:01 PM	RE: WCD - Privileged and Confidential	"Paul Aronzon" <paronzon@icloud.com>;"Tim Pohl" <trpadvisors2020@gmail.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Husnick, Chad J." <chusnick@kirkland.com>;"Zeiger, Jeffrey J." <jzeiger@kirkland.com>;"Campbell, Gavin" <gavin.campbell@kirkland.com>;"Schryver, Gavin D." <gavin.schryver@kirkland.com>;"Bank, Mac A." <mac.bank@kirkland.com>;"Levy, Katrina" <katrina.levy@kirkland.com>;"SVanAalten@coleschotz.com" <SVanAalten@coleschotz.com>		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79407	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324113	8/16/24 10:01 PM		Incremental Redline - WCD - 9019 Settlement - Agreement - KE Draft 8.16.24 to KE Draft 8.15.24.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79409	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324115	8/16/24 10:01 PM		WCD - 9019 Settlement - Agreement [KE Draft 8.16.2024].docx			"Tim Pohl" <trpadvisors2020@gmail.com>;"H usnick, Chad J." <chusnick@kirkland.com>;"Zeiger , Jeffrey J." <jzeiger@kirkland.com>;"Campbe ll, Gavin" <gavin.campbell@kirkland.com>;" Schryver, Gavin D." <gavin.schryver@kirkland.com>;" Bank, Mac A." <mac.bank@kirkland.com>;"Levy, Katrina" <katrina.levy@kirkland.com>;"SVa nAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79411	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324117	8/17/24 8:40 AM	Re: WCD - Privileged and Confidential		"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>	<SVanAalten@coleschotz.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79412	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324128	8/18/24 10:04 AM	Re: Whittaker [Privileged & Confidential]		"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79413	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324129	8/18/24 10:15 AM	Re: Whittaker [Privileged & Confidential]		"Paul Aronzon" <paronzon@icloud.com>	"Sterrett, Charles B." <charles.sterrett@kirkland.com>		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79414	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3324131	8/18/24 10:19 AM	Re: Whittaker [Privileged & Confidential]		"Sterrett, Charles B." <charles.sterrett@kirkland.com>	"Paul Aronzon" <paronzon@icloud.com>	Husnick, Chad J. <chusnick@kirkland.com>;Sterrett, Charles B. <charles.sterrett@kirkland.com>;Ze iger, Jeffrey J. <jzeiger@kirkland.com>;Campbell, Gavin <gavin.campbell@kirkland.com>;Schryver, Gavin D. <gavin.schryver@kirkland.com>;"SVa nAalten@coleschotz.com" <SVanAalten@coleschotz.com>	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79424	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400458	8/15/24 9:19 AM	WCD - Pohl Declarations (Privileged & Confidential)	00000000E7931E571B9BC4ABC1 D34098C1C192184102000.MSG	Bank, Mac A. [mac.bank@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com]	<SVanAalten@coleschotz.com>	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79426	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400460	8/15/24 9:19 AM		WCD - Pohl Declaration ISO 9019 Motion [K&E Draft 8.14.2024].docx				Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79427	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400461	8/19/24 4:50 PM	RE: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921240E2000.MSG	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Paul Aronzon [paronzon@icloud.com]; Tim Pohl [trpadvisors2020@gmail.com]	Husnick, Chad J. [chusnick@kirkland.com]; Zeiger, Jeffrey J. [jzeiger@kirkland.com]; Campbell, Gavin [gavin.campbell@kirkland.com]; Schryver, Gavin D. [gavin.schryver@kirkland.com]; Bank, Mac A. [mac.bank@kirkland.com]; Levy, Katrina [katrina.levy@kirkland.com]; *SVan Aalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings. Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79428	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400469	8/19/24 4:50 PM		WCD - 9019 Settlement - Agreement [KE Draft 8.19.2024].docx				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79430	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400471	8/19/24 4:50 PM		Incremental Redline - WCD - 9019 Settlement - Agreement - KE Draft 8.19.24 to NICO Draft 8.18.24.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79432	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400473	8/20/24 2:13 PM	RE: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921A40D2000.MSG	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Paul Aronzon [paronzon@icloud.com]; Tim Pohl [trpadvisors2020@gmail.com]	Husnick, Chad J. [chusnick@kirkland.com]; Zeiger, Jeffrey J. [jzeiger@kirkland.com]; Campbell, Gavin [gavin.campbell@kirkland.com]; Schryver, Gavin D. [gavin.schryver@kirkland.com]; Bank, Mac A. [mac.bank@kirkland.com]; Levy, Katrina [katrina.levy@kirkland.com]; *SVan Aalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings. Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79433	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400482	8/20/24 2:13 PM		WCD - 9019 Settlement - Agreement [KE Draft 8.20.2024].docx				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79434	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400483	8/20/24 2:13 PM		Cumulative Redline - WCD - 9019 Settlement - Agreement - KE Draft 8.20.24 to KE Draft 8.19.24.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

Exhibit A to TCC and FCR Letter  
(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79435 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400484	Re: WCD - Privileged and Attorney Work Product	8/20/24 4:49 PM Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921A40C2000.MSG	Paul Aronzon [paronzon@icloud.com]	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com];Hus nick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [zeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Sc hryver, Gavin D. [gavin.schryver@kirkland.com];Ba nk, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVan Aalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79436 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400494	Re: WCD - Privileged and Attorney Work Product	8/20/24 5:15 PM Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921840C2000.MSG	Tim Pohl [trpadvisors2020@gmail.com]	Paul Aronzon [paronzon@icloud.com]	Tim Pohl [trpadvisors2020@gmail.com];Hus nick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [zeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Sc hryver, Gavin D. [gavin.schryver@kirkland.com];Ba nk, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVan Aalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79437 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400504	RE: WCD - Privileged and Attorney Work Product	8/20/24 9:24 PM Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921040B2000.MSG	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Paul Aronzon [paronzon@icloud.com]	Tim Pohl [trpadvisors2020@gmail.com];Pa ul Aronzon [paronzon@icloud.com]	Husnick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [zeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Sc hryver, Gavin D. [gavin.schryver@kirkland.com];Ba nk, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVan Aalten@coleschotz.com [SVanAalten@coleschotz.com]	anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79440 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400516	Re: WCD - Privileged and Attorney Work Product	8/21/24 10:04 AM Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921C40B2000.MSG	Paul Aronzon [paronzon@icloud.com]	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com];Hus nick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [zeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Sc hryver, Gavin D. [gavin.schryver@kirkland.com];Ba nk, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVan Aalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	

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ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79441	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400526	8/21/24 10:49 AM	Re: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921A40B2000.MSG	Tim Pohl [trpadvisors2020@gmail.com]	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Paul Aronzon [paronzon@icloud.com];Husnick, Chad J. [CHusnick@kirkland.com];Zeiger, Jeffrey J. [zeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVan Aalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79442	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400537	8/21/24 11:28 AM	RE: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921640B2000.MSG	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com]	Paul Aronzon [paronzon@icloud.com];Husnick, Chad J. [CHusnick@kirkland.com];Zeiger, Jeffrey J. [zeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVan Aalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79443	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400548	8/21/24 11:28 AM	WCD - DD Materials - Settlement and DIP Update (8-21-2024).PDF					Presenting providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79444	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400560	8/21/24 11:50 AM	RE: WCD - Privileged and Confidential	0000000090539882B27B0442AAF3 D70CE8BC8322A4292000.MSG	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Paul Aronzon [paronzon@icloud.com]	Husnick, Chad J. [CHusnick@kirkland.com];Husnick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [zeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVan Aalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79445	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400572	8/21/24 8:21 PM	RE: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921240A2000.MSG	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com];Paul Aronzon [paronzon@icloud.com]	Paul Aronzon [paronzon@icloud.com];Husnick, Chad J. [CHusnick@kirkland.com];Zeiger, Jeffrey J. [zeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVan Aalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79446	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400584	8/21/24 8:21 PM	WCD - 9019 Settlement - Agreement [KE Draft 8.21.2024].docx					Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

Exhibit A to TCC and FCR Letter  
(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79447	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400585	8/21/24 8:21 PM		Redline - WCD - 9019 Settlement - Agreement - KE Draft 8.21.24 to KE Draft 8.20.24.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79448	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400586	8/21/24 8:21 PM		WCD - 9019 Settlement - Proposed Order [KE Draft 8.21.2024].docx				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79449	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400587	8/21/24 8:21 PM		Redline - WCD - 9019 Settlement - Proposed Order - KE Draft 8.21.2024 to KE Draft 8.15.2024.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79452	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400590	8/21/24 8:21 PM		WCD - Illustrative Chapter 11 Plan Term Sheet [KE Draft 8.21.24].docx				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79453	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400591	8/21/24 8:21 PM		Redline - WCD - Illustrative Chapter 11 Plan Term Sheet - KE Draft 8.21.24 to KE Draft 8.15.24.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79454	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400592	8/22/24 9:32 AM	Re: WCD - Privileged and Confidential	Paul Aronzon 00000000E7931E571B9BC4ABC1 D34098C1C1921E4092000.MSG	[paronzon@icloud.com] [charles.sterrett@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com];Husnick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com];Sterrett, Charles B. [charles.sterrett@kirkland.com];Husnick, Chad J. [CHusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com]		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79455	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400604	8/22/24 10:19 AM	Re: WCD - Privileged and Confidential	Tim Pohl 00000000E7931E571B9BC4ABC1 D34098C1C1921C4092000.MSG	[trpadvisors2020@gmail.com] [paronzon@icloud.com]	Paul Aronzon [paronzon@icloud.com]		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

Exhibit A to TCC and FCR Letter  
(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79456 Priv Redact	Attorney-Client Privilege; Attorney Work Product	RE: WCD - Privileged and Confidential	BNS-TCC-3400624	8/23/24 4:44 PM	00000000E7931E571B9BC4ABC1 D34098C1C192184072000.MSG	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com];Paul Aronzon [paronzon@icloud.com]	Husnick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79457 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	WCD - 9019 Settlement - Agreement [KE Draft 8.23.2024].docx	BNS-TCC-3400636	8/23/24 4:44 PM						Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79458 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	Redline - WCD - 9019 Settlement - Agreement - KE Draft 8.23.24 to KE Draft 8.21.24.pdf	BNS-TCC-3400637	8/23/24 4:44 PM						Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79465 Priv Redact	Attorney-Client Privilege; Attorney Work Product	RE: WCD - Pohl Declarations (Privileged & Confidential)	BNS-TCC-3400645	8/23/24 6:00 PM	00000000E7931E571B9BC4ABC1 D34098C1C192124072000.MSG	Bank, Mac A. [mac.bank@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com]	Husnick, Chad J. [chusnick@kirkland.com];Sterrett, Charles B. [charles.sterrett@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79466 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	WCD - Pohl Declaration ISO 9019 Motion [K&E Draft 8.23.2024].docx	BNS-TCC-3400646	8/23/24 6:00 PM						Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79467 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	Redline - WCD - Pohl Declaration ISO 9019 Motion - Revised to Last Circulated.pdf	BNS-TCC-3400647	8/23/24 6:00 PM						Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79468 Priv Redact	Attorney-Client Privilege; Attorney Work Product	RE: WCD - Pohl Declarations (Privileged & Confidential)	BNS-TCC-3400648	8/23/24 6:00 PM	0000000057340DA8EDBDF540B43 581D2F6AD56BBE4132000.MSG	Bank, Mac A. [mac.bank@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com]	Husnick, Chad J. [chusnick@kirkland.com];Sterrett, Charles B. [charles.sterrett@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79469	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400649	8/23/24 6:00 PM		WCD - Pohl Declaration ISO 9019 Motion [K&E Draft 8.23.2024].docx				Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79470	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400650	8/23/24 6:00 PM		Redline - WCD - Pohl Declaration ISO 9019 Motion - Revised to Last Circulated.pdf				Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79473	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400655	8/26/24 3:47 PM	RE: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921E4042000.MSG	Sterrett, Charles B. [trpadvisors2020@gmail.com];Paronzon, Ul Aronzon [charles.sterrett@kirkland.com] [paronzon@icloud.com]	Tim Pohl	Husnick, Chad J. [CHusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*Van Aalten, Coleschotz [VanAalten@coleschotz.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79474	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400667	8/26/24 3:47 PM		WCD - 9019 Settlement - Agreement [KE Draft 8.26.2024].docx				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79475	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400668	8/26/24 3:47 PM		WCD - 9019 Settlement - Proposed Order [KE Draft 8.26.2024].docx				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79476	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400669	8/26/24 3:47 PM		WCD - Illustrative Chapter 11 Plan Term Sheet [KE Draft 8.24.24].docx				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79477	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400670	8/26/24 3:47 PM		Redline - WCD - 9019 Settlement - Agreement - KE Draft 8.26.24 to KE Draft 8.23.24.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79478	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400671	8/26/24 3:47 PM		Redline - WCD - 9019 Settlement - Proposed Order - KE Draft 8.26.24 to KE Draft 8.21.24.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine	
79479	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400672	8/26/24 3:47 PM		Redline - WCD - Illustrative Chapter 11 Plan Term Sheet - KE Draft 8.24.24 to KE Draft 8.21.24.pdf			Tim Pohl [trpadvisors2020@gmail.com];Hus nick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Sc hryver, Gavin D. [gavin.schryver@kirkland.com];Ba nk, Mac A. [mac.bank@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVan Aalten@coleschotz.com [SVanAalten@coleschotz.com]	Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79480	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400673	8/26/24 6:43 PM	Re: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921A4042000.MSG	Paul Aronzon [paronzon@icloud.com]	Tim Pohl [trpadvisors2020@gmail.com];Paul Aronzon [paronzon@icloud.com]		Paul Aronzon [paronzon@icloud.com];Sterrett, Charles B. [charles.sterrett@kirkland.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79481	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400686	8/26/24 6:50 PM	Re: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C192184042000.MSG	Tim Pohl [trpadvisors2020@gmail.com]		Tim Pohl [trpadvisors2020@gmail.com];Paul Aronzon [paronzon@icloud.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79482	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400699	8/26/24 7:14 PM	Re: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C192164042000.MSG	Paul Aronzon [paronzon@icloud.com]	Tim Pohl [trpadvisors2020@gmail.com]		Paul Aronzon [paronzon@icloud.com];Tim Pohl [trpadvisors2020@gmail.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

Exhibit A to TCC and FCR Letter  
(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79483	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400724	8/29/24 12:55 PM	WCD - Privileged and Confidential	0000000090539882B27B0442AAF3D70CE8BC832244112000.MSG	Tim Pohl [trpadvisors2020@gmail.com];Paul Aronzon [paronzon@icloud.com]	[katrina.levy@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com]	Husnick, Chad J. [CHusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Banks, Mac A. [mac.bank@kirkland.com];Freedman, Max M. [max.freedman@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com]	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79484	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400726	8/29/24 12:55 PM		1. WCD - 9019 Settlement - Motion [K&E Draft 8-29-2024].PDF				Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79485	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400727	8/29/24 12:55 PM		2. WCD - 9019 Settlement - Proposed Order [KE Draft 8-26-2024].PDF				Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79486	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400728	8/29/24 12:55 PM		3. WCD - 9019 Settlement - Agreement [KE Draft 8-29-2024].PDF				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79487	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400729	8/29/24 12:55 PM		4. WCD - Illustrative Chapter 11 Plan Term Sheet [KE Draft 8-29-24].PDF				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79488	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400730	8/29/24 12:55 PM		5. WCD - Pohl Declaration ISO 9019 Motion [K&E Draft 8-28-2024].PDF				Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79494	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3400736	8/29/24 12:55 PM		11. WCD - DD Materials - Settlement and DIP Authorization Presentation (8-29-2024).pdf				Presentation providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79495	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401120	8/29/24 12:55 PM		13. WCD - Omnibus UWC re 9019 Settlement and DIP Facility [K&E Draft 8-28-2024].PDF				Document providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

Exhibit A to TCC and FCR Letter  
(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79496	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401121	8/29/24 12:55 PM		Redline - WCD - 9019 Settlement - Agreement.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79500	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401125	8/29/24 12:55 PM		Redline - WCD - Illustrative Chapter 11 Plan Term Sheet.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79501	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401126	8/29/24 12:55 PM		Redline - WCD - Pohl Declaration ISO 9019 Motion - Revised to Last Circulated to Declarant.pdf				Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79502	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401127	8/29/24 1:33 PM	WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C192164022000.MSG	Sterrett, Charles B. [trpadvisors2020@gmail.com];Paronzon, Ul Aronzon [ularonzon@icloud.com]	Tim Pohl [max.freeman@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com];Mohsin (Mo) Meghji [mmeghji@m3-partners.com]	Husnick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Freedman, Max M. [max.freedman@kirkland.com];Evans, Katrina [katrina.levy@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com];Mohsin (Mo) Meghji [mmeghji@m3-partners.com]	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79503	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401129	8/29/24 1:33 PM		1. WCD - 9019 Settlement - Motion [K&E Draft 8-29-2024].PDF				Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79504	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401130	8/29/24 1:33 PM		2. WCD - 9019 Settlement - Proposed Order [KE Draft 8-26-2024].PDF				Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79505	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401131	8/29/24 1:33 PM		3. WCD - 9019 Settlement - Agreement [KE Draft 8-29-2024].PDF				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79506	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401132	8/29/24 1:33 PM		4. WCD - Illustrative Chapter 11 Plan Term Sheet [KE Draft 8-29-24].PDF				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine	
79507	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401133	8/29/24 1:33 PM		5. WCD - Pohl Declaration ISO 9019 Motion [K&E Draft 8-28-2024].PDF				Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79513	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401139	8/29/24 1:33 PM		11. WCD - DD Materials - Settlement and DIP Authorization Presentation (8-29-2024).pdf				Presentation providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79514	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401524	8/29/24 1:33 PM		13. WCD - Disinterested Direct Resolutions re 9019 Settlement and DIP Facility [K&E Draft 8-28-2024].PDF				Document providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79515	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401525	8/29/24 1:33 PM		Redline - WCD - 9019 Settlement - Agreement.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79519	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401529	8/29/24 1:33 PM		Redline - WCD - Illustrative Chapter 11 Plan Term Sheet.pdf				Draft agreement providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79520	Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401530	8/29/24 1:33 PM		Redline - WCD - Pohl Declaration ISO 9019 Motion.pdf	Raj Mehta [rrmehta@nationalindemnity.com]; Tim Pohl [trpadvisors2020@gmail.com]; Paul Aronzon [paronzon@icloud.com]; Mohsin Meghji [mmeghji@m3-partners.com]	Husnick, Chad J. [chusnick@kirkland.com]; Sussberg, Josh [jsussberg@kirkland.com]; Sterrett, Charles B. [charles.sterrett@kirkland.com]; Manning, Rex [rex.manning@kirkland.com]		Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79521	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401531	8/29/24 2:28 PM	WCD - Motion to Dismiss Appeal Extension Request	000000090539882B27B0442AAF3 D70CE8BC83224102000.MSG	Freedman, Max M. [max.freedman@kirkland.com]			Raj Mehta [rrmehta@nationalindemnity.com]; Tim Pohl [trpadvisors2020@gmail.com]; Mohsin Meghji [mmeghji@m3-partners.com]; Husnick, Chad J. [chusnick@kirkland.com]; Sussberg, Josh [jsussberg@kirkland.com]; Sterrett, Charles B. [charles.sterrett@kirkland.com]; Manning, Rex [rex.manning@kirkland.com]	Email providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79522	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401532	8/29/24 2:30 PM	Re: WCD - Motion to Dismiss Appeal Extension Request	000000090539882B27B0442AAF3 D70CE8BC832204102000.MSG	Paul Aronzon [paronzon@icloud.com]; Freedman, Max M. [max.freedman@kirkland.com]			Raj Mehta [rrmehta@nationalindemnity.com]; Tim Pohl [trpadvisors2020@gmail.com]; Mohsin Meghji [mmeghji@m3-partners.com]; Husnick, Chad J. [chusnick@kirkland.com]; Sussberg, Josh [jsussberg@kirkland.com]; Sterrett, Charles B. [charles.sterrett@kirkland.com]; Manning, Rex [rex.manning@kirkland.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

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(Oct. 17, 2024)

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79523	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401533	8/29/24 3:01 PM	RE: WCD - Motion to Dismiss Appeal Extension Request	000000090539882B27B0442AAF3 D70CE8BC8322040F2000.MSG	Raj Mehta [rmehta@nationalindemnity.com]	Freedman, Max M. [max.freedman@kirkland.com];Tim Pohl [trpadvisors2020@gmail.com];Paul Aronzon [paronzon@icloud.com];Meghji [mmeghji@m3-partners.com]	Husnick, Chad J. [chusnick@kirkland.com];Sussberg, Josh [jsussberg@kirkland.com];Sterrett, Charles B. [charles.sterrett@kirkland.com];Manning, Rex [rex.manning@kirkland.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79524	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401534	8/29/24 3:04 PM	Re: WCD - Motion to Dismiss Appeal Extension	000000090539882B27B0442AAF3 D70CE8BC8322A40E2000.MSG	Tim Pohl [trpadvisors2020@gmail.com]	Freedman, Max M. [max.freedman@kirkland.com]	Raj Mehta [rmehta@nationalindemnity.com];Paul Aronzon [paronzon@icloud.com];Meghji [mmeghji@m3-partners.com];Husnick, Chad J. [chusnick@kirkland.com];Sussberg, Josh [jsussberg@kirkland.com];Sterrett, Charles B. [charles.sterrett@kirkland.com];Manning, Rex [rex.manning@kirkland.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79525	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401535	8/29/24 3:05 PM	RE: WCD - Motion to Dismiss Appeal Extension	000000090539882B27B0442AAF3 D70CE8BC8322640E2000.MSG	Freedman, Max M. [max.freedman@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com]	Raj Mehta [rmehta@nationalindemnity.com];Paul Aronzon [paronzon@icloud.com];Meghji [mmeghji@m3-partners.com];Husnick, Chad J. [chusnick@kirkland.com];Sussberg, Josh [jsussberg@kirkland.com];Sterrett, Charles B. [charles.sterrett@kirkland.com];Manning, Rex [rex.manning@kirkland.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79526	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401537	8/29/24 5:31 PM	Re: WCD - Motion to Dismiss Appeal Extension	000000090539882B27B0442AAF3 D70CE8BC8322040E2000.MSG	Mohsin (Mo) Meghji [mmeghji@m3-partners.com]	Freedman, Max M. [max.freedman@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com];Raj Mehta [rmehta@nationalindemnity.com];Paul Aronzon [paronzon@icloud.com];Husnick, Chad J. [chusnick@kirkland.com];Sussberg, Josh [jsussberg@kirkland.com];Sterrett, Charles B. [charles.sterrett@kirkland.com];Manning, Rex [rex.manning@kirkland.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79527	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401539	8/30/24 12:03 PM	RE: WCD - Privileged and Confidential	000000090539882B27B0442AAF3 D70CE8BC8322840C2000.MSG	TS/CN=CHARLES STERRETT [trpadvisors2020@gmail.com]	Tim Pohl [trpadvisors2020@gmail.com]	STERRETT, Charles B. [/O=KIRKLAND-ELLIS/OU=EXCHANGE/ADMINISTRATIVE/GROUP/(FYDIBOHF23SPDLT)/CN=RECIPIENT]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79528 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401541	RE: WCD - Privileged and Confidential	8/30/24 12:44 PM	00000000E7931E571B9BC4ABC1 D34098C1C1921E4012000.MSG	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com]; Paul Aronzon [paronzon@icloud.com]	Husnick, Chad J. [chusnick@kirkland.com]; Zeiger, Jeffrey J. [jzeiger@kirkland.com]; Campbell, Gavin [gavin.campbell@kirkland.com]; Schryver, Gavin D. [gavin.schryver@kirkland.com]; Bank, Mac A. [mac.bank@kirkland.com]; Freedman, Max M. [max.freedman@kirkland.com]; Levy, Katrina [katrina.levy@kirkland.com]; SVanAalten [SVanAalten@coleschotz.com]; Mohsin (Mo) Meghji [mmeghji@m3-partners.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79529 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401543	WCD - Pohl Declaration ISO 9019 Motion [K&E Draft 8.29.2024].docx	8/30/24 12:44 PM						Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79530 Priv Withhold	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401544	Redline - WCD - Pohl Declaration ISO 9019 Motion - Revised to Last Circulated.pdf	8/30/24 12:44 PM						Draft litigation pleading providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79533 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401547	Re: WCD - Privileged and Confidential	8/30/24 1:09 PM	00000000E7931E571B9BC4ABC1 D34098C1C192184012000.MSG	Paul Aronzon [paronzon@icloud.com]; Sterrett, Charles B. [charles.sterrett@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com]; Husnick, Chad J. [chusnick@kirkland.com]; Zeiger, Jeffrey J. [jzeiger@kirkland.com]; Campbell, Gavin [gavin.campbell@kirkland.com]; Schryver, Gavin D. [gavin.schryver@kirkland.com]; Bank, Mac A. [mac.bank@kirkland.com]; Freedman, Max M. [max.freedman@kirkland.com]; Levy, Katrina [katrina.levy@kirkland.com]; SVanAalten [SVanAalten@coleschotz.com]; Mohsin (Mo) Meghji [mmeghji@m3-partners.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.		
79534 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401550	Re: WCD - Privileged and Confidential	8/30/24 1:35 PM	0000000090539882B27B0442AAF3 D70CE8BC8322240C2000.MSG	Tim Pohl [trpadvisors2020@gmail.com]	Sterrett, Charles B. [charles.sterrett@kirkland.com]			Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79535 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401555		8/30/24 1:40 PM	Re: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C1921A4012000.MSG	Tim Pohl [trpadvisors2020@gmail.com]	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Paul Aronzon [paronzon@icloud.com];Husnick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Freedman, Max M. [max.freedman@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com];Mohsin (Mo) Meghji [mmeighji@m3-partners.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79536 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401558		8/30/24 2:37 PM	RE: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C192164012000.MSG	TS/CN=CHARLES STERRETT] Paul Aronzon [paronzon@icloud.com]	Sterrett, Charles B. [/O=KIRKLAND-ELLIS/OU=EXCHANGEADMINISTRATIVEGROUP(FYDIBOHF23SPDLT)/CN=RECIPIENT] Paul Aronzon [paronzon@icloud.com];Husnick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Freedman, Max M. [max.freedman@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com];Mohsin (Mo) Meghji [mmeighji@m3-partners.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79537 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401561		8/30/24 7:20 PM	Re: WCD - Privileged and Confidential	000000090539882B27B0442AAF3 D70CE8BC8322040A2000.MSG	Paul Aronzon [paronzon@icloud.com]	Sterrett, Charles B. [/O=KIRKLAND-ELLIS/OU=EXCHANGEADMINISTRATIVEGROUP(FYDIBOHF23SPDLT)/CN=RECIPIENT] Paul Aronzon [paronzon@icloud.com];Husnick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Freedman, Max M. [max.freedman@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com];Mohsin (Mo) Meghji [mmeighji@m3-partners.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	
79538 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401565		8/30/24 7:51 PM	RE: WCD - Privileged and Confidential	00000000E7931E571B9BC4ABC1 D34098C1C192144012000.MSG	TS/CN=CHARLES STERRETT] Tim Pohl [trpadvisors2020@gmail.com]	Sterrett, Charles B. [/O=KIRKLAND-ELLIS/OU=EXCHANGEADMINISTRATIVEGROUP(FYDIBOHF23SPDLT)/CN=RECIPIENT] Tim Pohl [trpadvisors2020@gmail.com] Paul Aronzon [paronzon@icloud.com];Husnick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Schryver, Gavin D. [gavin.schryver@kirkland.com];Bank, Mac A. [mac.bank@kirkland.com];Freedman, Max M. [max.freedman@kirkland.com];Levy, Katrina [katrina.levy@kirkland.com];*SVanAalten@coleschotz.com [SVanAalten@coleschotz.com];Mohsin (Mo) Meghji [mmeighji@m3-partners.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79539	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401675	8/30/24 8:24 PM	Re: WCD - Privileged and Confidential	000000090539882B27B0442AAF3 D70CE8BC832264092000.MSG	Paul Aronzon [paronzon@icloud.com]	Sterrett, Charles B. [charles.sterrett@kirkland.com]		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79540	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401679	9/1/24 2:22 PM	Re: WCD - Privileged and Confidential	000000090539882B27B0442AAF3 D70CE8BC8322E4002000.MSG	Paul Aronzon [paronzon@icloud.com]	Sterrett, Charles B. [charles.sterrett@kirkland.com]		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79541	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401683	9/1/24 2:36 PM	Re: WCD - Privileged and Confidential	000000090539882B27B0442AAF3 D70CE8BC8322C4002000.MSG	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Paul Aronzon [paronzon@icloud.com]		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79542	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401687	9/1/24 2:38 PM	Re: WCD - Privileged and Confidential	000000090539882B27B0442AAF3 D70CE8BC832284002000.MSG	Paul Aronzon [paronzon@icloud.com]	Sterrett, Charles B. [charles.sterrett@kirkland.com]		Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79543	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401691	9/1/24 2:41 PM	Re: WCD - Privileged and Confidential	000000090539882B27B0442AAF3 D70CE8BC832264002000.MSG	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Paul Aronzon [paronzon@icloud.com]	Husnick, Chad J. [chusnick@kirkland.com]; Zeiger, Jeffrey J. [jzeiger@kirkland.com]; Campbell, Gavin [gavin.campbell@kirkland.com]; Schryver, Gavin D. [gavin.schryver@kirkland.com]; Bank, Mac A. [mac.bank@kirkland.com]; Freedman, Max M. [max.freedman@kirkland.com]; Levy, Katrina [katrina.levy@kirkland.com]; SVanAalten [SVanAalten@coleschotz.com]; Mohsin (Mo) Meghji [mmeghji@m3-partners.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79544	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401696	9/3/24 6:47 PM	RE: WCD - Privileged and Confidential	00000006E64B03E36606D4E8C6 F3427CD10532344032000.MSG	Sterrett, Charles B. [charles.sterrett@kirkland.com]	Tim Pohl [trpadvisors2020@gmail.com]; Paul Aronzon [paronzon@icloud.com]	Aalten [SVanAalten@coleschotz.com]; Mohsin (Mo) Meghji [mmeghji@m3-partners.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

ID	Privilege	Privilege Type	Beg Bates	Parent Date	Email - Subject	File Name	From	To	CC	PL - LogLine
79545 Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3401737	RE: WCD - Privileged and 9/24 9:38 PM Confidential	9/24 9:38 PM	00000006E64B03E36606D4E8C6 F3427CD10532324012000.MSG	Sterrett, Charles B. [trpadvisors2020@gmail.com];Pa [charles.sterrett@ki rklan.com]	Tim Pohl ul Aronzon [paronzon@icloud.com]	Husnick, Chad J. [chusnick@kirkland.com];Zeiger, Jeffrey J. [jzeiger@kirkland.com];Campbell, Gavin [gavin.campbell@kirkland.com];Sc hryver, Gavin D. [gavin.schryver@kirkland.com];Ba nk, Mac A. [mac.bank@kirkland.com];Freedm an, Max M. [max.freedman@kirkland.com];Le vy, Katrina [katrina.levy@kirkland.com];*SVan [SVanAalten@coleschotz.com];M ohsin (Mo) Meghji [nmmeghji@m3- partners.com]	Email Chain providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.	

PLOG - ID	Privilege	Privilege Type	Production Begin Bates	Production - Non-Email	Parent Date	File Name	Author	PLOG - LogLine
78603	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-2220061	Loose Electronic Docs	11/15/23 3:54 PM	WCD - August 8 Board Meeting Minutes [Final] (Compiled)_ (102170982_1).pdf	mfreedma	Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
78604	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-2220065	Loose Electronic Docs	11/15/23 3:54 PM	WCD - July 19 Board Meeting Minutes [Final] (Compiled)_ (99733965_1).pdf	Sterrett, Charles B.	Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
78605	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-2220069	Loose Electronic Docs	11/15/23 3:54 PM	WCD - June 14 Board Meeting Minutes [Final] (Compiled)_ (99733958_1).pdf	mfreedma	Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
78606	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-2220073	Loose Electronic Docs	11/15/23 3:54 PM	WCD - May 18 Board Meeting Minutes [Final] (Compiled)_ (99733946_1).pdf	Sterrett, Charles B.	Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
78607	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-2220077	Loose Electronic Docs	11/15/23 3:54 PM	WCD - April 12 Board Meeting Minutes [Final] (Compiled)_ (97073583_1).pdf	mfreedma	Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding potential bankruptcy filing of Brilliant and/or subsidiaries.
78608	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-2220121	Loose Electronic Docs	11/15/23 3:54 PM	WCD - April 25 Board Meeting Minutes [Final] (Compiled)_ (97073582_1).pdf	mfreedma	Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding potential bankruptcy filing of Brilliant and/or subsidiaries.
78609	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3189660	Loose Electronic Docs	3/12/24 2:59 PM	WCD - November 20 Board Meeting Minutes [Final] (Compiled)_ (105960446_1).pdf	mfreedma	Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
78610	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3189664	Loose Electronic Docs	3/12/24 2:59 PM	WCD - October 12 Board Meeting Minutes [Final] (Compiled)_ (105960443_1).pdf	mfreedma	Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79063	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3316437		4/25/24 5:25 PM	WCD - April 3, 2024 Board Meeting Minutes [Final] (Compiled)_ (107860323_1).pdf	Sterrett, Charles B.	Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79064	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3316441		4/25/24 5:25 PM	WCD - March 1, 2024 Board Meeting Minutes [Final] (Compiled)_ (107860306_1).pdf	mfreedma	Meeting Minutes providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.
79547	Priv Redact	Attorney-Client Privilege; Attorney Work Product	BNS-TCC-3320587	Loose Electronic Docs	5/18/2023 9:08 PM	_2023.05.18_BNS Investigation Slides(96174768.4).pdf	Pam Payne	Presentation providing/requesting/containing legal advice and reflecting work performed by, or done at the direction of, counsel in anticipation of or in connection with litigation regarding the Debtors' chapter 11 proceedings.

# EXHIBIT B



# BOARD Presentation

May 2, 2024

Privileged and Confidential | Attorney Work Product

**Redacted - Privilege**

**Redacted - Privilege**

**Redacted - Privilege**

**Redacted - Privilege**